

# WCCSL Bulk Materials Processing Center and Related Actions

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## Final Environmental Impact Report Responses to Comments Document



June 2004



WCCSL Bulk Materials Processing  
Center and Related Actions

**FINAL ENVIRONMENTAL  
IMPACT REPORT**

**RESPONSES TO COMMENTS DOCUMENT**

June 2004

SCH# 2002102057

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# **CHAPTER 1**

## **INTRODUCTION**

This Final Environmental Impact Report (Final EIR) Responses to Comments Document has been prepared to respond to comments received by Contra Costa County on the Draft Environmental Impact Report (Draft EIR) for the WCCSL Bulk Materials Processing Center and Related Actions. After completion of the Draft EIR in November 2003, Contra County (County) is required to consult with, and obtain comments from, public agencies with jurisdiction by law on proposed actions of the proposed project (Project), and to provide the general public with opportunity to review and comment on the Draft EIR. The County is also required to provide responses to comments raised during the public review period related to significant environmental impacts of the Project (California Environmental Quality Act [CEQA] Guidelines Sections 15087 and 15088).

A Draft EIR was distributed for public review and comment in November 2003. This document includes a revised summary of impacts, control measures, and mitigation measures (Table 2-1 from the Draft EIR); the comments received on the Draft EIR; responses to individual comments; and a chapter that contains revisions to the Draft EIR text and graphics as appropriate. This Responses to Comments Document, together with the November 2003 Draft EIR and technical appendices, constitutes the Final EIR. This Final EIR contains the following elements:

- The Draft EIR dated November 2003 (bound separately)
- Letters from public agencies, organizations, and persons commenting on the Draft EIR, including a transcript of public testimony received at the public hearing held on November 25, 2003
- A chapter containing a revised summary of impacts, control measures, and mitigation measures (Table 2-1 from the Draft EIR).
- Responses to comments
- A chapter containing revised text and graphics prepared to clarify or correct the text of the Draft EIR.

This Final EIR does not contain the proposed environmental impact findings and mitigation monitoring program to be adopted by the County Board of Supervisors and/or the City of Richmond as part of the certification of the Final EIR before the Project may be approved (Public Resources Code Section 21081.6 and CEQA Guidelines 15091[a][1]).

## **CHAPTER 2**

### **REVISED SUMMARY OF IMPACTS, CONTROL MEASURES AND MITIGATION MEASURES**

Table 2-1 from the Draft EIR has been modified based on the comments received and is included herein. Text deletions are identified in ~~strikeout~~; text additions are identified in **bold** underlined text.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 4. Land Use, Plans, and Policies</b></p> <p>IMPACT 4-1. The proposed Project includes a variety of activities and facilities, the operation of which could make the WCCSL incompatible with surrounding land use.</p> <p>IMPACT 4-2. Implementation of the Trail could expose users to the effects created by other Project activities.</p> <p>IMPACT 4-3. Continuation of waste disposal and resource recovery activities could be inconsistent with the San Francisco Bay Plan.</p> <p>IMPACT 4-4. Proposed Project components are not consistent with the County or Regional NDFE.</p> <p>IMPACT 4-5. Implementation of the expanded operations at the BMPC and Central IRRF, and continued landfill operations at the WCCSL through January 2006 present the potential for continued or increased illegal dumping activity in the North Richmond area.</p>	<p>None required</p> <p>None required</p> <p>None required</p> <p>None</p> <p>None</p>	<p>Less than significant</p> <p>Less than significant</p> <p>Less than significant</p> <p>Potentially significant</p> <p>Potentially significant</p>	<p>None required</p> <p>None required</p> <p>None required</p> <p>a) The County and Authority would revise their NDFEs to include the proposed WRC at the BMPC as a transfer facility (non-disposal facility) pursuant to Article 7, Chapter 9, Division 7 of Title 14 of the California Code of Regulations.</p> <p>a) The agency(ies) with applicable permit authority (County, City, or LEA) and mitigation monitoring responsibility would require that applicable permits contain conditions of approval specifying the following:</p>	<p>Less than significant</p> <p>Less than significant</p> <p>Less than significant</p> <p>Less than significant</p> <p>Less than significant</p>

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 4 (continued)</b></p> <p>IMPACT 4-5 (continued)</p>			<ul style="list-style-type: none"> <li>▪ Mitigation Fee. The facility operator shall pay a mitigation fee of an amount to be determined by the applicable permitting authority(ies) to defray annual costs associated with collection and disposal of illegally dumped waste and associated impacts in North Richmond and adjacent areas. The mitigation fee should be subject to the joint control of the City and County and should be collected on all solid waste and processible materials received at the facility consistent with the existing mitigation fee collected at the Central IRRF.</li> <li>▪ Agency Coordination. Facility operator shall participate in County or City task forces and pilot programs established to address illegal dumping in North Richmond and adjacent city areas.</li> <li>▪ Off-Site Debris and Litter Policing. The facility operator shall provide weekly debris and litter clean up of Parr Boulevard from the Richmond Parkway to the facility entrance and roads within the “Hotspot Zones 1-6” identified in Table 4-3 and Figure 4-5 of this EIR.</li> </ul>	

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 4 (continued)</b></p> <p>IMPACT 4-5 (continued)</p>			<p>and on other access roads as directed by the permitting authority(ies). As needed, the permitting authority(ies) may require more frequent policing to control debris or litter.</p> <ul style="list-style-type: none"> <li>▪ Littering Signs. The facility operator shall install and maintain signs noting littering and illegal dumping laws and penalties along Parr Boulevard (the main access road to the facility) and the following other access roads: <ul style="list-style-type: none"> <li>○ Richmond Parkway, from Parr Blvd. to Gertrude Ave.</li> <li>○ Pittsburg Ave., from Richmond Parkway to 3<sup>rd</sup> Street</li> <li>○ Garden Track Blvd., south of Pittsburg Ave.</li> <li>○ Market Ave., from 1<sup>st</sup> Street to the SPRR tracks.</li> <li>○ 3<sup>rd</sup> Street, from Market Ave. to Grove Ave.</li> <li>○ 5<sup>th</sup> Street, from Verde Ave. to Chesley Ave.</li> <li>○ Battery Street, from Alamo Ave. to Vernon Ave.</li> <li>○ Kelsey Street at the</li> </ul> </li> </ul>	

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 4 (continued)</b></p> <p>IMPACT 4-5 (continued)</p>			<p>SPRR tracks</p> <ul style="list-style-type: none"> <li>▪ The permitting authority(ies) may designate other roads for signage as needed. The text on the signage should be subject to the review and approval of the permitting authority(ies).</li> <li>▪ Hotline. The facility operator shall establish an Illegal Dumping Hotline phone number for use by residents and businesses to report incidences of illegal dumping in the North Richmond area. The hotline phone number shall be prominently listed on all “littering signs” described above. Reports or complaints shall be investigated within 24 hours. Verified incidents of illegal dumping or litter or debris shall be collected within 24 to 48 hours of verification, unless additional time is allowed by the applicable permitting authority.</li> <li>▪ Reporting Requirements. The facility operator shall maintain records regarding all complaints/reports and actions taken to respond including locations, dates, and times. Records shall be made available to the County or City upon request.</li> </ul>	

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 5. Geology, Soils, and Seismicity</b>				
IMPACT 5-1. Liquefaction occurring in sandy soil below the landfill and/or associated structures could cause ground surface settlement and/or lateral spreading at the landfill sideslopes, causing damage to the cover, environmental control systems, and buildings.	a) The liquefaction analysis for the WCCSL would be updated in <del>late 2003</del> <b>2004</b> and recommendations incorporated into post-earthquake maintenance and repair plans. b) Following an earthquake, inspections of the landfill would be performed by the Site Engineer and necessary repairs made. c) Under the seismic scenarios where the barrier wall is breached, an inward hydraulic gradient would be maintained prior to and throughout the repair.	Less than significant	None required	Less than significant
IMPACT 5-2. Settlement of the landfill under proposed refuse and cover fill loads could impact site grading and runoff.	a) A program of landfill inspection, maintenance, and repair will continue to be implemented consistent with State regulations and as detailed in the RDSI and Postclosure Plan. The program will maintain the final grading at the site to prevent ponding and minimize infiltration in accordance with State regulations and will include permanent monument installation and aerial photogrammetry to develop site topography and iso-settlement maps. Repair to the cover system, if necessary, may require placement of additional fill.	Less than significant	None required	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 5 (continued)</b>				
IMPACT 5-3. Settlement of the landfill under proposed refuse and cover fill loads could impact cover integrity.	None required	Less than significant	None required	Less than significant
IMPACT 5-4. The placement of stockpiles could cause additional landfill settlement.	a) Stockpiles would be located a minimum of 50 feet from the crest of 4:1 (horizontal:vertical) landfill sideslopes. b) Stockpiles would have maximum slopes of 6:1 for heavier materials such as concrete rubble and 5:1 for lighter materials such as wood waste. c) Maximum stockpile height would be 20 feet. d) A stockpile plan would be approved by a registered professional engineer before any stockpiling occurs.	Less than significant	None required	Less than significant
IMPACT 5-5. Settlement of the landfill under existing and/or proposed fill loads could impact existing and proposed structures supported on the landfill.	a) Adjustable height building columns and footers would be used for proposed building facilities.	Potentially significant	a) Geotechnical studies would be performed for each proposed/renovated site structure to be located on waste fill that evaluate impacts of landfill settlement on building performance, as well as additional settlement, if any, caused by new structures, and recommendations included in construction plans and specifications.	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 5 (continued)</b></p> <p>IMPACT 5-5 (continued)</p>			<p>b) Flexible utility connections would, if deemed necessary, be considered to reduce damage to utilities resulting from differential settlement between buildings and the surround ground.</p> <p>c) Settlement of buildings would be addressed in WCCSL Post-Closure Plan with monitoring and repair as needed.</p>	
<p>IMPACT 5-6. Settlement of the landfill under new refuse and cover fill loads could impact lateral containment structures.</p>	None	Potentially significant	<p>a) If new fill is placed for construction of the proposed WRC, additional studies would be performed to evaluate settlement, slope stability, and potential impacts on the integrity of the soil-attapulgate slurry wall with recommendations included in construction plans and specifications.</p> <p>b) Periodic monitoring would be consistent with the recommendations of Mitigation Measure 5-6(a) to evaluate the condition of the soil-attapulgate slurry wall and appropriate repairs made as necessary.</p>	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 5 (continued)</b>				
IMPACT 5-7. The placement of new fill could cause a static slope or cover failure that could damage the landfill cap and environmental control systems.	None	Less than significant	None required	Less than significant
IMPACT 5-8. The combination of new fill placement and seismic shaking could cause slope deformations, which could damage the landfill cap and environmental control systems.	<p>a) Following an earthquake, an inspection program would be implemented to evaluate the extent of cracking of the cover materials, damage to LFG collection system, damage to leachate collection and pumping systems, global landfill sliding, and cracking of the barrier wall. Appropriate repairs would be pursuant to RWQCB Order No. R2-2002-0066.</p> <p>b) Under the seismic scenarios where the barrier wall is breached, an inward hydraulic gradient would be maintained prior to and throughout the repair (see Control Measure 5-1(c)).</p> <p>c) A slope remediation study would be performed, or a long-term slope maintenance program would be developed to address the consequence and possible repairs resulting from large seismically-induced permanent slope displacements.</p>	Potentially significant	a) A plan for inspection and as-needed repair of the GCL following an earthquake would be added to the Post-Closure Plan.	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 5 (continued)</b> IMPACT 5-8 (continued)</p>	<p>d) As recommended by EMCON/OWT, Inc. slope stability report, a probabilistic analysis of the permanent displacements would be performed to be used in developing a detailed earthquake response plan. The response plan would provide details on procedures to be followed for inspection of the site following major earthquakes, and on the slope maintenance requirement that may be triggered by significant displacements.</p>			
<p>IMPACT 5-9. Slope deformations or slope failure at the proposed WRC site could impact the soil-attapulgate slurry wall.</p>	<p>a) The inspection, monitoring and repair plans outlined in the Post-Closure Maintenance Plan would be followed.</p> <p>b) Following a significant earthquake (magnitude 6.5 or greater), the site would be inspected to evaluate the performance of the environmental control systems related to the Class I landfill. Slurry wall deformations in excess of 1 foot would require a notification to DTSC and RWQCB within 14 days and repairs made pursuant to their recommendations.</p>	Potentially significant	<p>a) If new fill will be placed for construction of the proposed WRC, additional studies would be performed to evaluate potential settlement, slope stability, and movement of the soil-attapulgate slurry wall and recommendations would be incorporated into construction plans and specifications.</p>	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 5 (continued)</b>				
IMPACT 5-10. Ground shaking during an earthquake could affect building structures and associated improvements.	a) New buildings would be designed to meet the 1997 UBC Seismic Zone Factor 4 standards, and constructed in accordance with all applicable building codes and regulations.	Potentially significant	a) To ensure proper structural design, a geotechnical report would be prepared for all new buildings with recommendations incorporated into construction plans and specifications (see Mitigation Measure 5-5(a)). The geotechnical report would discuss the potential for differential ground surface settlement and the need for flexible utility connections (see Mitigation Measure 5.5(b)).	Less than significant
IMPACT 5-11. The construction and operation of new buildings and facilities, as well as construction of the cap itself, could cause damage to the landfill cover (cap).	a) During construction, the subgrade would be prepared properly to create a smooth surface and proper construction and quality assurance monitoring would be conducted consistent with the requirements of the Postclosure Plan.  b) If the cover (including the GCL) is damaged during construction or post-closure activities, it would be repaired or replaced.	Less than significant	None required	Less than significant
<b>Chapter 6. Water Resources</b>				
IMPACT 6-1. Proposed Project components could result in violation of water quality standards or WDRs.	None	Less than significant	None required	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 6 (continued)</b></p> <p>IMPACT 6-2 Proposed Project components could generate either increased quantities of pollutants or new sources of pollutants, which could infiltrate the soil column and degrade underlying groundwater quality.</p>	<p>a) A minimum of 3 feet of compacted soil would be placed over the final landfill cap in the central plateau, which will underlie operations areas and serve to protect the final cap.</p> <p>b) Benchmark marker layers would be established and annually monitored to determine that the upper 3-foot-thick soil buffer is not removed over time.</p> <p>c) Additional compacted soil would be placed as necessary to augment and maintain the 3-foot soil layer.</p> <p>d) Additional soil on the southern and eastern landfill slopes would be placed prior to application of dredged material and biosolids. Per control measures (a – c), establish benchmark marker layers, monitor annually, and place additional soil as necessary to protect the final cap.</p> <p>e) Annual soil moisture monitoring would be conducted during the initial years of dredged materials and biosolids application and, if necessary, adjustments will be made to facility operation under review and oversight of the RWQCB.</p> <p>f) Prior to full-scale implementation of dredged materials and/or biosolids spreading, further testing would be conducted, under LEA review and</p>	Less than significant	None required	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 6 (continued)</b> IMPACT 6-2 (continued)	oversight, of application methods and rates to optimize operational procedures while not overloading the soil's moisture assimilation capacity.  g) Prior to accepting dredged materials for disposal, the Applicant would require the project sponsor to meet specific requirements including providing specifications on material to be delivered and on-site operating protocols needed to manage the materials on site to prevent water quality impacts.  h) Plan and implement a leachate removal program in accordance with the requirements of Order No. R2-2002-0066 that would provide an inward hydraulic gradient to the landfill.			
IMPACT 6-3. The proposed Project would alter the existing drainage pattern of the site or contribute increased runoff that could exceed system capacity and result in on-site or off-site flooding.	None	Less than significant	None required	Less than significant
IMPACT 6-4 The proposed Project could produce increased runoff that could result in substantial erosion or siltation on or off site, or otherwise degrade surface water quality.	a) A Notice of Intent and revised SWPPP related to proposed operations would be submitted for approval by the Executive Officer of the RWQCB; Best Management Practices would be implemented for control of storm water.	Potentially significant	a) Upon completion of the additional biosolids spreading trials per Control Measure 6-4(d), the Applicant would prepare a Progress Report for RWQCB review and approval. The Progress Report would include, at a minimum, the following:	Less than significant

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 6 (continued)</b> IMPACT 6-4 (continued)	<p>b) The existing Drainage, Erosion, and Sediment Control Plan would be modified pursuant to County LUP No. 2054-92, as amended by LUP No. 2043-94, and City CUP No. 92-53. The FDIP would then be finalized and if amended use permits are obtained, the Applicant would comply with permit conditions.</p> <p>c) Modified or new Solid Waste Facility Permits would be obtained from the LEA and CIWMB for the landfill, Composting Facility, and WRC and permit conditions would be followed.</p> <p>d) Further testing of biosolids spreading would be conducted prior to full-scale implementation to refine the rates and methods of application, under the review and oversight of the RWQCB. Revised permits would be obtained as necessary and the Applicant would abide by permit conditions.</p> <p>e) BMPs at the Composting Facility would be employed that would optimize applied water to the windrows while minimizing the generation of leachate.</p>		<ul style="list-style-type: none"> <li>▪ Purpose of Biosolids Spreading</li> <li>▪ Approach and Methodology</li> <li>▪ Results</li> <li>▪ Environmental Controls</li> <li>▪ Conclusions and Recommendations</li> <li>▪ Other Components Deemed Necessary by the RWQCB</li> </ul> <p>The Progress Report should demonstrate the maximum acceptable biosolids loading rate, given available site area and physical constraints and the need to maximize drying and to control runoff.</p>	
IMPACT 6-5. The proposed Trail could result in exposure of people to risk due to flooding.	a) The Trail would be closed during times of unusually wet weather when the potential exists that the Trail could be flooded.	Less than significant	None required	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 6 (continued)</b>				
IMPACT 6-6. The Project is inconsistent with local General Plans, North Shoreline Specific Plan, and the Basin Plan.	None	Less than significant	None required	Less than significant
<b>Chapter 7. Aesthetics and Visual Quality</b>				
IMPACT 7-1. The proposed Project involves an increased landfill height; expanded operations on the central plateau, with several new buildings including the Wet/Dusty Material Blending Facility; dredged material and/or biosolids spreading on the southern and eastern landfill sideslopes; and a new WRC, all of which could affect the visual quality of the area.	None	Less than significant	None required	Less than significant
IMPACT 7-2. The proposed Project involves expanded operations during nighttime hours, which would introduce new sources of light and glare and could affect views in the area.	None	Less than significant	None required	Less than significant
IMPACT 7-3. The proposed WRC/transfer station and expanded BMPC operations could introduce new sources of litter that could degrade the visual quality of the area.	a) The existing Litter Control Program would be modified pursuant to County LUP No. 2054-92, as amended by LUP No. 2043-94, and City CUP No. 92-53, the FDIP revised, and if amended use permits obtained, adherence to permit conditions.	Less than significant	None required	Less than significant

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.



**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 7 (continued)</b> IMPACT 7-3 (continued)	<p>b) Revised and new SWFP's would be obtained and litter abatement requirements would be implemented.</p> <p>c) Provide a covered receiving structure (or building), if determined necessary by the LEA, which would be intended to manage litter as well as bird and vector control.</p>			
IMPACT 7-4. Use of the Trail would introduce a new source of littering in an area of high visual and biological quality.	<p>a) Trash and recycling receptacles would be located at specified locations along the Trail.</p> <p>b) The Trail would be maintained on a weekly basis, including emptying of receptacles and collection of litter.</p>	Less than significant	None required	Less than significant
IMPACT 7-5. The Project could be inconsistent with County and City General Plans and the North Shoreline Specific Plan.	None	Less than significant	None required	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 8. Traffic and Circulation</b>				
IMPACT 8-1. The proposed Project would generate a net increase in ADT of 970 vehicles per day in 2015, which is substantial, yet only about 1.2 percent of the ADT projected for the Richmond Parkway for that year.	a) Traffic would be limited and controlled at certain times of the day. This would not reduce the total traffic, but would shift some traffic to off-peak hours. b) Travel patterns for the WCCSL truck traffic would be managed to avoid trips during the peak commute hours, especially the AM peak. c) Management controls would be developed to limit trips through congested road systems during the AM and PM peak hours.	Less than significant	None required	Less than significant
IMPACT 8-2. Additional Project-related traffic could adversely impact traffic flow and congestion at the I-80/Richmond parkway and I-580/Garrard Boulevard interchanges.	None	Less than significant	None required	Less than significant
IMPACT 8-3. Projected increases in Project-related traffic could further deteriorate pavement conditions on Parr Boulevard.	None	Potentially significant	a) A pavement monitoring program would be undertaken by Applicant for the Parr Boulevard connection to Richmond Parkway. The program would provide before and after video evidence of pavement conditions, and may require the posting of a pavement repair bond. Applicant would coordinate with the Maintenance Division of the County Public Works Department regarding the details of the monitoring program and any requirements for road repair should they become necessary.	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 8 (continued)</b>				
IMPACT 8-4. Additional Project-related traffic could result in on-site congestion and unsafe conditions for WCCSL users and employees.	None	Less than significant	None required	Less than significant
IMPACT 8-5. Additional Project-related traffic could result in unsafe conditions for users of the Trail.	a) A barrier (i.e., “k-rails,” concrete blocks, telephone poles, or soil berms) would be placed along the Phase 3 Trail near the scale house to physically separate Trail users from vehicular traffic using the WCCSL operations areas.  b) A designated crossing with signage and pavement striping would be provided for users of the Trail to safely cross the traffic on the main roadway leading to the WCCSL scale house. Signage will require motorists to stop for pedestrians.  c) The Trail parking lot would have improvements consisting mainly of traffic control barriers that would designate the limits of the parking area and its entrance roadway.	Less than significant	None required	Less than significant
IMPACT 8-6. The proposed Project is consistent with transportation plans and programs in North Richmond.	None	Less than significant	None required	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 9. Biological Resources</b></p> <p>IMPACT 9-1. The proposed Project could have a substantial adverse effect on habitat for special-status species.</p>	<p>a) Dogs would not be permitted on the Trail.</p> <p>b) An interpretive program would be implemented explaining the sensitivity of the surrounding marshland habitat.</p> <p>c) The Trail (Barrier) Planting Recommendations developed by Environmental Stewardship &amp; Planning would be implemented to control the spread of invasive exotics and to establish a protective buffer of native vegetation between the proposed Trail alignment and adjacent marsh and open water habitats.</p>	Potentially significant	<p>a) The interpretive program proposed by the Applicant would be developed in consultation with the Bay Conservation Development Commission (BCDC) and DFG to educate Trail users of the sensitivity of the marshland and open water habitat to wildlife, the prohibition on take and harassment of special-status species, and the requirement of staying on the Trail to minimize disturbance to sensitive wildlife.</p> <p>b) Adequate controls would be developed as part of the interpretive program to prevent human access into the San Pablo Creek Marsh habitat along the Phase 3 segment of the Trail north of the WCCSL. This may require use of exclusionary fencing, and shall at minimum include installation of permanent signage at 100-foot intervals which states:</p> <div style="border: 1px solid black; padding: 10px; text-align: center;"> <p>No Trail Access Sensitive Wildlife Habitat Visitor Access Prohibited</p> </div>	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 9 (continued)</b> IMPACT 9-1 (continued)			c) As currently proposed, dogs would be prohibited from using the Trail. Permanent signage would be installed as part of the interpretive program at the trailhead and as separate permanent signs within 100 yards of the beginning of the northern and southern trail segments explaining the sensitivity of the area and clearly state “No Dogs Allowed.” Signage would refer users to other local shoreline parks where dogs are permitted (e.g. Berkeley Shores Park, Point Isabel). Experience gained from operation of the Trail would be used by the appropriate entities to determine whether additional enforcement measures are necessary and possible funding measures.  d) As directed by appropriate agencies, the Applicant would coordinate efforts on predator control of feral cats, dogs, and red fox.  e) All construction activities on the levees, including installation of any Trail improvements and the barrier landscape plantings, would be prohibited during the nesting season for salt marsh dependent bird species, from February 1 through July 31.	

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 9 (continued)</b> IMPACT 9-1 (continued)			f) Trail improvements would be restricted to uplands, the tops of existing levees, and the existing roadway along the south side of San Pablo Creek to minimize further disturbance in the adjacent marsh and riparian habitats.  <b><u>“g) Due to the possible hazard to trail users, the Bayside Trail (Barrier) Planting Recommendation would be revised to eliminate poison oak from the revegetation planting palette and from any future landscaping plans for the Project.”</u></b>	
IMPACT 9-2. The proposed Project could adversely affect sensitive natural communities.	None	Less than significant	None required	Less than significant
IMPACT 9-3. The proposed Project could adversely affect wetlands.	None	Potentially significant	a) Any modifications to the shoreline of San Pablo Bay required as part of the construction of the staging area for the interpretive program at the southern end of Area C, would be coordinated with the Corps and BCDC and appropriate authorizations obtained prior to any modifications to the shoreline and open water of San Pablo Bay.	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 9 (continued)</b></p> <p>IMPACT 9-4. The proposed Project could have significant impacts on wildlife habitat and wildlife movement opportunities.</p>	None	Potentially significant	<p>a) The Phase 4 alignment of the Public Access Trail would be eliminated from the proposed Project to avoid the <del>required</del> resulting disturbance to shoreline habitat on this portion of the site and prevent the potential disruption to wildlife habitat along the existing isolated levee segment. <u><b>The proposed Phase I Trail improvements from the southern end of the mainland levee along the west side of Area C to the first breach in the outer levee would also be eliminated from the proposed Project, serving to minimize potential disturbance to approximately half of the open water and mudflat habitat in Area C. Split rail fencing or similar barrier would be installed within 10 yards of the point where the levee narrows north of the proposed kayak staging area.</b></u></p> <p>b) Permanent signage would be installed as part of the required interpretive program at the southern end of the levee along the west side of Area C which deters visitor access to this segment of the levee. The signage would be installed at 20-foot intervals across the width of the levee, within 10 yards of the point where the levee narrows north of the proposed kayak staging area.</p>	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 9 (continued)</b> IMPACT 9-4 (continued)			<p>The signage would state:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> No Trail Access  Sensitive Wildlife Habitat  Visitor Access Prohibited </div> <p><b>“c) Permanent signage would be installed as part of the required interpretive program on both sides of the water access at the proposed kayak staging area to inform kayak users that access into the sloughs of the coastal salt marsh to the southeast is prohibited during the nesting season to prevent possible disturbance to rails and other wildlife. The signage would state:</b></p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <u><b>Sensitive Wildlife Habitat</b></u>  <u><b>No Kayak Access to Marshland and Sloughs</b></u>  <u><b>During Bird Nesting Season – February 1 through August 31”</b></u> </div>	

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 9 (continued)</b> IMPACT 9-5. The proposed Project is consistent with local plans, policies or ordinances protecting biological resources or adopted Habitat Conservation Plans or Natural Community Conservation Plans.	None	Less than significant	None required	Less than significant
<b>Chapter 10. Air Quality and Odor</b> IMPACT 10-1. The construction of various Project elements could result in dust nuisance.	None	Potentially significant	a) All active construction areas would be watered at least twice daily and more often during windy periods (20 mph or higher). b) All trucks hauling soil, sand, and other loose materials would be covered or required to maintain at least two feet of freeboard. c) All unpaved access roads, parking areas and staging areas at construction sites would be paved, watered at least twice daily or more often if windy, or receive applications of non-toxic soil stabilizers. d) All paved access roads, parking areas and staging areas at construction sites would be swept daily with water sweepers. e) Inactive construction areas would be hydroseeded or non-toxic soil stabilizers would be applied. f) Exposed stockpiles (dirt, sand, etc.)	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 10 (continued)</b></p> <p>IMPACT 10-1 (continued)</p> <p>IMPACT 10-2. Emission increases from on-site sources would exceed the BAAQMD significance thresholds for PM<sub>10</sub>.</p>	<p><b>General Measures:</b></p> <p>a) The main access road would initially be graveled, treated with non-toxic soil stabilizers and watered at least twice daily. After land settlement, the main access road would be paved.</p> <p><b>Waste Recycling Center:</b></p> <p>b) Handling and sorting of mixed waste would occur within an enclosed WRC or partially enclosed structure.</p> <p>c) Roads, unloading areas and the processing area of the WRC <b><u>mixed waste processing area</u></b> would be paved, and sweepers or vacuums would be used to keep these surfaces clean.</p> <p>d) Periodic watering at least twice daily, or more often when windy, would be used on internal roads as needed at the WRC, and wind fences would be strategically located to control wind erosion.</p>	<p>Potentially significant</p>	<p>would either be enclosed, covered, watered twice daily or more often if windy <b><u>unless a non-erosive soil crust is maintained</u></b> or receive application of non-toxic soil stabilizers.</p> <p>g) Traffic signage would limit traffic speeds on unpaved roads to 15 mph.</p> <p>a) The Applicant would, at the earliest practical date, prepare applications to the BAAQMD for new sources proposed to be located at the site, obtain required BAAQMD permits, and comply with all permit conditions.</p>	<p>A significant unavoidable PM<sub>10</sub> impact remains.</p>

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 10 (continued)</b> IMPACT 10-2 (continued)	<p>e) Waste would be pre-screened to avoid dusty materials.</p> <p><b>Green Waste/Woodwaste/Composting:</b></p> <p>f) Green material and wood shredding/screening equipment would be equipped with water sprays.</p> <p>g) <del>Green waste, w</del>Wood waste, and composting materials would be watered as unloaded, <u>the surfaces of the unloading areas would be routinely sprayed with water during the dry season, and materials would be periodically watered during the dry season prior to grinding.</u></p> <p>h) Green waste, wood waste, and composting materials would be pre-screened to avoid dusty materials.</p> <p>i) Windrows and intervening pathways would be watered prior to turning of windrow.</p> <p>j) Internal roads in the Organic Materials Processing Area would be watered at least twice daily, more often when windy.</p> <p>k) Finished stabilized compost would be screened and loaded during low wind speed conditions (less than 20 mph); handling of compost would be suspended if the wind speed increases (above 20 mph).</p> <p>l) Berms would be used in the Organic Materials Processing Area to provide</p>			

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 10 (continued)</b> IMPACT 10-2 (continued)	<p>an upwind barrier to reduce wind effects.</p> <p>m) Wind fences would be strategically located in the Organic Materials Processing Area to control wind erosion.</p> <p><b>Wet/Dusty Material Blending:</b></p> <p>n) A three-sided shelter would be constructed at the West/Dusty Material Blending Facility with fabric roof to contain dusty materials.</p> <p>o) Dusty materials would be blended with high moisture wastes to help control fugitive dust.</p> <p>p) Dusty materials would be stored in plastic bags until needed.</p> <p><b>Soil Reclamation:</b></p> <p>q) Water sprays would be used on the conveyor at the Soil Reclamation Facility.</p> <p>r) The apron on two sides of the soil reclamation storage area would be graveled to provide an all-weather surface.</p> <p>s) Periodic watering (at least twice daily, more often when windy) would be conducted at the soil reclamation operation areas for dust control.</p>			

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 10 (continued)</b> IMPACT 10-2 (continued)	<b>Concrete/Asphalt Recycling:</b>  t) Water sprays would be used on concrete/asphalt crushers, screens and conveyors.  u) Dust suppressants would be used and regular watering (at least twice daily, more often when windy) would be conducted at the Concrete/Asphalt Recycling Facility for general dust control.			
IMPACT 10-3. Increased vehicular traffic to the WCCSL could result in increased emissions and adverse air quality and health risk impacts.	None	Less than significant	None required	Less than significant
IMPACT 10-4. Project impacts would be consistent with the regional air quality plan.	None	Less than significant	None required	Less than significant
IMPACT 10-5. The Organic Materials Processing Area and expansion of the Composting Facility could create objectionable odors.	a) The Applicant would work with the LEA to assure facility compliance with the OIMP.  b) Food processing industry materials would be rapidly incorporated (within hours) with other compostible materials, shredded materials, or compost.	Potentially significant	a) The turning of the windrows would be limited when the wind is blowing inland toward potential receptors. Turning and screening operations would be curtailed when wind speeds exceed 20 miles per hour (mph) toward developed areas.	Less than significant

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 10 (continued)</b> IMPACT 10-5 (continued)</p>	<p>c) The windrows would be turned on an average of twice per week to maintain aerobic conditions.</p> <p>d) A monitoring program would be implemented to track the composting process and implement operational adjustments as necessary.</p> <p>e) The operations areas would be regraded to promote drainage and prevent ponding of compost leachate.</p>		<p>b) An appropriately sited wind monitoring station would be installed with an alarm to indicate the occurrence of winds greater than 20 mph.</p> <p>c) A one-year composting demonstration project would be conducted under the review and oversight of the LEA and the BAAQMD. The demonstration project would focus on all feedstocks with a high nuisance odor potential and would identify composting operations and controls necessary to assure an efficient operation that would control odors under various climatic conditions. Based on the results of the demonstration project, the LEA and the BAAQMD would determine under what conditions these feedstocks could be used at the Composting Facility as part of the Composting Facility permitting process. The demonstration project shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>▪ The scale of the demonstration project would duplicate the pile size and operational factors of the planned facility, so that valid data are collected at full-size operation.</li> </ul>	

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 10 (continued)</b> IMPACT 10-5 (continued)			<ul style="list-style-type: none"> <li>▪ The span of feedstock combinations would encompass the range of expected future options, concentrating on worst-case combinations from processing, operations, and odor standpoints.</li> <li>▪ Monitoring during the demonstration period would include standard compost processing monitoring parameters as well as odor emission data during different operating and climate/wind conditions. Odor data would include emissions of critical constituents such as reduced sulfur compounds and reduced nitrogen compounds, as well as total odor emission data collected via odor panel with flux chamber protocols. <b><u>The Applicant shall help design the odor monitoring program with regulatory agency input and oversight.</u></b> Downwind odor data would be collected concurrent with pile or source emission data to correlate the impacts.</li> <li>▪ Odor impacts from demonstration scale will be extrapolated for the full-scale system through odor modeling or similar approach that</li> </ul>	

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 10 (continued)</b></p> <p>IMPACT 10-7. Application of liquid anaerobically digested sludge to the southern and eastern sideslopes of the closed landfill could create objectionable odors.</p>	<p>a) Prior to full-scale implementation of liquid biosolids spreading, further testing would be conducted to refine the rates and methods of application.</p>	<p>Potentially significant</p>	<p>a) The feasibility of WCWD providing short-term lagoon storage (2 to 3 months) of anaerobically digested sludge (i.e., a slurry in a lagoon) with a liquid aerobic cap would be demonstrated and evaluated. This evaluation shall include, but is not limited to, the following measures:</p> <ul style="list-style-type: none"> <li>▪ Short-term lagoon storage approach would be demonstrated to reduce odor impacts with spraying of sludge on the landfill sideslopes.</li> <li>▪ Volatile solids reductions from lagoon feedstock to lagoon withdrawal material would be identified.</li> <li>▪ Odor monitoring at the short-term lagoon storage system would be continued to confirm that this storage system in itself will not cause an odor problem.</li> <li>▪ Operational criteria would be determined for lagoon feed rates and loading, sludge withdrawal, cap water maintenance, maintaining “aerobic” cap conditions, cap water covering all sludge material, lagoon supernatant handling, etc.</li> </ul>	<p>Less than significant</p>

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 10 (continued)</b> IMPACT 10-7 (continued)			b) A liquid biosolids spreading demonstration project work plan would be prepared, under the review and oversight of the LEA and BAAQMD and demonstrate whether residual odor would be consistent with impact standards of the BAAQMD and this EIR. The results of Mitigation Measure 10-7(a) would determine whether the sludge, which has received short-term storage, can be integrated into the work plan. The work plan shall include, but not be limited to, the following items: <ul style="list-style-type: none"> <li>▪ Identify the types of biosolids that will be spread in the demonstration program; i.e., digested sludge direct from digesters, sludge removed from lagoon after “X” months of storage, etc. Identify the analytical work that will be completed on such material to help identify odor impacts of spreading (percent solids, percent volatile solids, pH, ammonia, temperature, total reduced sulfur compounds (TRS), etc.</li> <li>▪ Identify/define data that will be collected at the spray application site including area loading rates, spray flow rates, and nozzle pressures, spray distances, and data collected during spraying such as odor monitoring in the vicinity and downwind.</li> </ul>	

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 10 (continued)</b></p> <p>IMPACT 10-7 (continued)</p>			<p>Spraying would be conducted in different climate/wind conditions to establish potential limitations for full-scale operation.</p> <ul style="list-style-type: none"> <li>▪ Identify/define data that will be collected on water that runs off the application areas: quantity of water and data on BOD, SS, nutrient content (including ammonia). Fecal coliform density of any runoff solids would be determined.</li> <li>▪ Identify the various conditions under which spraying will be limited such as time of day, wind/atmosphere conditions, precipitation conditions, frequency of application, and other conditions.</li> </ul> <p>c) The liquid biosolids spreading demonstration project would be conducted under the review and oversight of the LEA and BAAQMD, and a report of findings prepared. The Applicant would demonstrate that liquid biosolids can be spray-applied as proposed without creating nuisance odor conditions. The LEA and BAAQMD would then determine under what conditions liquid biosolids can be spray-applied to the landfill slopes to provide the required odor control. The work plan shall include, but not be limited to the following items:</p>	

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 10 (continued)</b> IMPACT 10-7 (continued)			<ul style="list-style-type: none"> <li>▪ Analysis of data would be extrapolated to determine nearby area/downwind odor impacts from biosolids spraying operations. Atmospheric odor modeling would be used as necessary to make these predictions.</li> <li>▪ Identify control measures that will provide acceptable odor, to include: limits on loading rates (liquid and solids loading), limits on type of biosolids applied, climate/wind restrictions, time of day restrictions, frequency of application, and other appropriate limits.</li> <li>▪ Analyze information to identify the fate of biosolids pollutants, such as nutrients (nutrients taken up by site vegetation, or percolate downward into the final landfill cover, or contained in site runoff, transformed in gaseous release to atmosphere, etc.), and similar fate for biosolids metals and also for residual pathogens within biosolids.</li> </ul>	

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 10 (continued)</b>				
IMPACT 10-8. Application of dredged materials obtained from local Bay and harbor dredging operations to the southern and eastern sideslopes of the closed landfill could create objectionable odors.	None	Less than significant	None required	Less than significant
IMPACT 10-9. Increased landfill capacity would extend the filling operation to about 2005, which could create objectionable odors. .	a) Highly odorous MSW loads would be rejected. b) Daily cover would be applied to landfill wastes. c) Operation of the LFG extraction system would be continued. d) Ongoing maintenance of landfill sideslope areas would be continued to seal off cracks and fill erosion channels.	Less than significant	None required	Less than significant
<b>Chapter 11. Health and Safety</b>				
IMPACT 11-1. Increases in the volume of incoming waste stream along with expanded site recycling and solid waste disposal activities on site could expose employees and users to increased hazards associated with exposure to the materials and the equipment used for its processing.	a) The existing WCCSL Public Health and Safety Plan required pursuant to County and City use permits would be modified, amended permits sought, and permit conditions followed. b) The requirements of the RFD, building codes, and CAL/OSHA would be incorporated into the design, construction and operation of new facilities. c) Formal training of personnel would continue to be conducted that includes the proper use of facility equipment; identification avoidance and reporting	Less than significant	None required	Less than significant

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 11 (continued)</b> IMPACT 11-1 (continued)	<p>of conditions that could potentially compromise safety; identification and management of HHW; regular safety meetings; and annual review and refresher training to ensure continued safe operation and compliance with regulations.</p> <p>d) Users of the facility would be restricted to selected areas for unloading and loading of materials through the use of temporary barriers, signage, and staff. Restricted areas or areas of potential risk would be off limits to the general public.</p> <p>e) Workers would be equipped with the appropriate safety clothing, safety equipment readily available for all site personnel.</p> <p>f) The hazardous waste screening program at the WCCSL and BMPC facilities would be continued.</p> <p>g) <b><u>If the Waste Shuttle Facility needs to be used until the WRC construction is complete, wind screens and litter fencing would be used during high wind conditions to help minimize the risks to employees at the sorting line, and to control litter.</u></b></p>			

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 11 (continued)</b>				
IMPACT 11-2. The proposed Project would be located within the WCCSL, adjacent to the Class I HWMF, which is a hazardous materials site and could create a significant hazard to the public and environment.	None	Less than significant	None required	Less than significant
IMPACT 11-3. Project construction and operation could result in the accidental spillage of diesel fuel and other chemicals at the site, which could impact public safety and the environment.	<del>None</del> <b>a) <u>Contract agreements with builders and tenant operators shall contain control measures for spills of diesel and other chemicals.</u></b>	Less than significant	None required	Less than significant
IMPACT 11-4. LFG contains methane, which is explosive in the 5 to 15 percent range under conditions of confined space with sufficient oxygen for combustion.	a) The WRC building expansion would be constructed with the necessary LFG controls consistent with the requirements of the LEA and the RFD, and the facility would continue to be included in the WCCSL LFG monitoring program.  b) Ongoing monitoring of the landfill cover integrity would be conducted and necessary repairs to control LFG venting made.	Less than significant	None required	Less than significant

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 11 (continued)</b></p> <p>IMPACT 11-5. The receipt, processing and disposal of solid waste materials have the potential to create a fire hazard with associated health and safety impacts.</p>	<p>a) A Fire Protection Component for the WRC meeting the requirements of the RFD and the LEA to contain and extinguish fires originating at the facility would be developed and implemented. The program would be subject to the approval of the RFD and LEA and would address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>▪ Fire protection and suppression measures, including fire sprinkler system with hose and nozzles stationed at key locations, for the facility.</li> <li>▪ Fire breaks and access roads.</li> <li>▪ Fire extinguisher types and locations.</li> <li>▪ Machinery and equipment inspection program.</li> <li>▪ Household hazardous waste facilities specifications to meet fire and safety codes due to temporary storage of intercepted household hazardous wastes.</li> <li>▪ Fire control training of employees.</li> <li>▪ Federal OSHA employee training requirements for handling of hazardous materials/waste.</li> <li>▪ Self-enforcement of the smoking prohibition by facility personnel and customers.</li> </ul>	Less than significant	None required	Less than significant

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.



**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 11 (continued)</b></p> <p>IMPACT 11-5 (continued)</p>	<ul style="list-style-type: none"> <li>▪ Water truck.</li> <li>b) The existing Fire Protection Component for the Composting Facility would be revised as necessary under the review and oversight of the local fire districts and the LEA. The Fire Protection Component addresses the following: <ul style="list-style-type: none"> <li>▪ Use of good operating practices, fire breaks, and emergency water supply.</li> <li>▪ Compost windrows would be separated by 12-foot-wide fire lane, have a 10-foot maximum height, monitored for temperature and moisture, and sprayed with water to control composting temperatures.</li> <li>▪ Presence of fire extinguishers, smoking prohibitions, a water truck, an ongoing inspection program for conditions that could create a fire hazard, and limiting the depth of green materials and wood waste storage piles to 20 feet.</li> <li>▪ Use of on-site equipment to extinguish a fire if it occurs.</li> </ul> </li> <li>c) All required permits from the RFD would be obtained and the Applicant would comply with permit conditions.</li> <li>d) Necessary measures at the landfill would be taken for prompt fire control at the landfill, including use of heavy</li> </ul>			

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 11 (continued)</b> IMPACT 11-5 (continued)</p>	<p>equipment, stockpiled soil, and water suppression.</p> <p>e) Any incoming burning wastes would be deposited in a safe area and extinguished pursuant to 27 CCR §20780.</p> <p>f) The WCCSL Emergency Response and Evacuation Plan would be implemented as necessary.</p>			
<p>IMPACT 11-6. The generation of bioaerosols and endotoxins during the composting process can create health and safety issues for employees and users of the facility.</p>	<p>a) Water would be applied at least twice daily, more often when windy, on internal roads for dust control purposes.</p> <p>b) <del>Green waste, w</del>Wood waste, and composting materials would be watered as unloaded, <u>the surfaces of the unloading areas would be routinely sprayed with water during the dry season, and materials would be periodically watered during the dry season prior to grinding.</u></p> <p>c) Green waste, wood waste, and composting materials would be pre-screened to avoid dusty materials.</p> <p>d) Water spray would be applied during the shredding process to wet the material being shredded.</p> <p>e) Water would be applied on the compost windrows and pathways prior to aeration (turning).</p>	Less than significant	None required	Less than significant

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 11 (continued)</b> IMPACT 11-6 (continued)</p> <p>IMPACT 11-7. The proposed spraying or spreading of liquid biosolids (greater than 90 percent moisture) to the landfill sideslopes as well as the spreading of drier biosolids (less than 90 percent moisture) could impact WCCSL employees and users of the Trail.</p>	<p>f) Finished stabilized compost would be screened and loaded during low wind speed conditions (less than 20 mph); handling of compost would be suspended if the wind speed increases (above 20 mph).</p> <p>g) Heavy equipment would have enclosed cabs for operators, and other employees would be required to use dust masks as necessary.</p> <p>h) Uniforms are available to employees, and shower facilities would also be available in the proposed WRC so employees can shower and change clothes at the end of the day.</p> <p>i) Wind fences and berms would be strategically located in the Organics Materials Processing Area to reduce wind effects and control wind erosion.</p> <p>a) Biosolids would not be placed in any area where the public can have contact with the materials. During biosolids application, sensitive portions of the Trail would be closed for a 4- to 6-week period and areas fenced off to prevent public access until the materials are disked into the soil surface of the landfill cover.</p> <p>b) Signs would be posted at the edge of biosolids application areas indicating boundaries of the area and warning unauthorized persons of the restricted access.</p>	Potentially significant	<p>a) WCCSL employees would have the necessary inoculations prior to their participation in the biosolids spreading program.</p> <p>b) The Applicant would demonstrate to the RWQCB that lagoon storage of biosolids at the WCWD produces Class A biosolids pursuant to 40 CFR 503 regulations. This demonstration shall include, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>▪ A work plan would be prepared which defines the pathogen and related testing</li> </ul>	Less than significant

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 11 (continued)</b> IMPACT 11-7 (continued)	<p>c) Spray application of liquid biosolids of typically 2 to 6 percent solids would be conducted at the southwestern portion of the WCCSL site only under favorable wind conditions (e.g., less than 10 mph), when wind drift of bioaerosols to the Trail is not likely.</p> <p>d) Spray application of biosolids would be conducted in a downwind direction and applications would be adjusted to account for wind speeds and directions. Spraying would be suspended if necessary (wind speeds in excess of 20 mph or wind blowing toward the Trail).</p> <p>e) Employees would be required to use protective clothing and instructed in proper biosolids handling procedures.</p> <p>f) Regular follow-up observations of working practices would be conducted by the Applicant and quarterly employee retraining would be required to assure public health safeguards are met.</p> <p>g) An annual report would be prepared, under the review and oversight of the LEA, which summarizes the health protection procedures that were followed, any problems, and corrective measures that were or need to be taken.</p>		<p>that will be completed on the biosolids. The work plan would be reviewed by the RWQCB and the EPA Region 9 Sludge Coordinator before beginning work.</p> <ul style="list-style-type: none"> <li>▪ Upon approval of the work plan, pathogen testing work would be completed on digested sludge and sludge withdrawn from the storage lagoon to determine if Class A pathogen densities have been achieved.</li> <li>▪ Lagoon operational parameters would be defined during this testing work that would then be used in the future to help define the conditions under which Class A material is produced – conditions such as length of time within lagoon storage, feeding limitations, etc.</li> </ul> <p>c) Lacking such a demonstration in Mitigation Measure (b) above, the Applicant would demonstrate to the RWQCB that a combination of Trail closure, rotational dried biosolids spreading, and fencing can be used to provide the necessary site restrictions to conform to 40 CFR 503 regulations and provide the necessary public health protection. The demonstration shall include, but is not limited to, the following:</p>	

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<p><b>Chapter 11 (continued)</b></p> <p>IMPACT 11-7 (continued)</p>			<ul style="list-style-type: none"> <li>▪ Identify set-back distances/ restrictions from the Trail and any other public-accessible area/locations.</li> <li>▪ Define fencing, signing, and related features that will be adequate to prevent public access to areas of biosolids application under certain site conditions.</li> <li>▪ Define other restrictions such as area closure during and after spreading/application, closure for certain periods of time or time of day, closure during rain, fog, or other situations.</li> </ul> <p>d) The Applicant would demonstrate to the RWQCB compliance with the vector attraction reduction requirements of 40 CFR 503 regulations. It is assumed Option 1, Table 11-4) would be appropriate and involves demonstrating that the mass of volatile solids (VS) in the biosolids is reduced by a minimum of 38 percent during biosolids treatment. The minimum of 38 percent VS reduction in the treatment system can be demonstrated with either of the two following methods:</p> <ul style="list-style-type: none"> <li>▪ <b>Direct Calculations.</b> The VS concentration in its influent and effluent biosolids samples</li> </ul>	

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- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 11 (continued)</b> IMPACT 11-7 (continued)			<p>will be monitored. Influent samples would be the 24-hour composite sample paced with the influent flow rates. Effluent samples could be daily grab samples. The mass of VS reduction can be calculated directly from the flow and VS concentration data.</p> <ul style="list-style-type: none"> <li>▪ <b>Sludge Production.</b> The VS reduction is proportionate to the sludge production. From the biochemical oxygen demand and total suspended solids concentrations and flow rate in the influent and effluent samples, the sludge production rate can be calculated and the reduction of VS mass can be verified.</li> </ul>	
IMPACT 11-8. Biosolids and dredged materials can contain elevated levels of organic chemicals, which can make the land application or composting of these materials potentially harmful to public health and safety and the environment.	a) Prior to accepting biosolids from WCWD or other sources, or dredged materials, the Applicant would enforce WCCSL's Waste Acceptance Guidelines and require the project sponsor to provide sufficient chemical characterization data that would enable the Applicant to demonstrate to the RWQCB that the material is non-hazardous pursuant to 40 CFR Part 261 and 22 CCR, Division 4.5, Chapter 11, Article 3.	Less than significant	None required	Less than significant

- Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

Impact	Applicant-proposed control measure <sup>a</sup>	Potential significance with control measure	EIR recommended mitigation measure <sup>b</sup>	Potential significance with mitigation
<b>Chapter 11 (continued)</b>				
IMPACT 11-9. Biosolids can contain elevated levels of pollutants, which can make land application of this material potentially harmful to public health and safety and the environment.	a) Prior to accepting biosolids from sources other than WCWD, the Applicant would enforce WCCSL's Waste Acceptance Guidelines and require the entity to provide documentation (including test results) that the biosolids meet pollutant limits included in 40 CFR 503 and 14 CCR §17868.2 regulations, and testing standards under 22 CCR.	Less than significant	None required	Less than significant
IMPACT 11-10. Elevated pathogen and pollutant levels in the finished compost product could make its use harmful to public health and safety and the environment.	a) The Applicant would comply with Federal and State regulatory standards for compost operation, pollutant concentrations, pathogen reduction, monitoring, recordkeeping, and reporting.	Less than significant	None required	Less than significant
IMPACT 11-11. Green wastes can contain the plant pathogen <i>Phytophthora ramorum</i> , the causative agent of Sudden Oak Death. The Composting Facility and Wood Waste Recovery Facility could facilitate the spread of this pathogen.	None	Potentially significant	a) The Applicant would comply with new revised Federal rule and revised California rule regarding composting and control of <i>Phytophthora ramorum</i> , expected some time in 2003. If finished compost or mulch is transported out of the quarantined area, a Compliance Agreement would be executed with the County Agricultural Commissioner at the required time and specified conditions therein followed.	Less than significant.

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**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

<b>Impact</b>	<b>Applicant-proposed control measure<sup>a</sup></b>	<b>Potential significance with control measure</b>	<b>EIR recommended mitigation measure<sup>b</sup></b>	<b>Potential significance with mitigation</b>
<b>Chapter 11 (continued)</b> IMPACT 11-12. Expansion of the incoming waste stream along with increased site recycling and solid waste disposal activities could lead to increased presence of vectors and nuisance pests which could be harmful to public health and safety.	None	Less than significant	None required	Less than significant
<b>Chapter 12. Noise</b> IMPACT 12-1. The proposed Project would involve expanded activities and equipment usage, expanded hours of operation, as well as relocated operations, which could result in increased noise levels in excess of standards and/or a permanent increase in ambient noise levels.	None	Less than significant	None required	Less than significant
IMPACT 12-2. The proposed Project could expose persons to excessive noise or vibration levels.	None	Less than significant	None required	Less than significant
IMPACT 12-3. The proposed Project could result in a temporary or periodic increase in ambient noise levels.	None	Less than significant	None required	Less than significant

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.



**Table 2-1. Summary of Impacts, Control Measures and Mitigation Measures (continued)**

<b>Impact</b>	<b>Applicant-proposed control measure<sup>a</sup></b>	<b>Potential significance with control measure</b>	<b>EIR recommended mitigation measure<sup>b</sup></b>	<b>Potential significance with mitigation</b>
<b>Chapter 12 (continued)</b>  IMPACT 12-4. The proposed Project would increase traffic on the local street system serving the WCCSL and would extend the hours that materials could be transported to the BMPC, thereby potentially exposing sensitive land uses adjacent to the roadways to new and increased ambient noise levels.	None	Less than significant	None required	Less than significant

- a. Control measures are proposed by the Applicant as part of the proposed Project. Control measures typically are procedures known to further reduce the potential for impacts based on regulatory agency requirements, standards in the industry, and operating experience.
- b. Mitigation measures are measures recommended by this EIR to be implemented where there is a significant impact and no Applicant-proposed control measures have been identified, or in combination with proposed control measures. Mitigation measures are designed to reduce impacts to a less-than-significant level compared to stated significance criteria.

## CHAPTER 3

### COMMENTS AND RESPONSES

This chapter contains a list of public agencies, organizations, and persons commenting on the Draft EIR. This list is followed by copies of written comments and a transcript of verbal comments made at the public hearing on the Draft EIR held by the Contra Costa County Zoning Administrator on November 25, 2003.

For each letter, substantive comments are identified by number. Each comment letter is followed by responses to the numerically identified comment. Responses that state that a change to the Draft EIR has been made are immediately followed by the appropriate text. Chapter 4 also contains a compilation of text revisions to the Draft EIR. Text deletions are indicated in ~~strikeout~~; text additions are identified in **bold underlined text**.

**Table 3-1. List of Public Agencies, Organizations and  
Persons Commenting on the Draft EIR**

Letter No.	Date	Source
		STATE AGENCIES
1	12/22/03	California Governor's Office of Planning and Research
2	12/18/03	California Integrated Waste Management Board
		REGIONAL AGENCIES
3	12/12/03	Association of Bay Area Governments, San Francisco Bay Trail
4	12/22/03	Bay Area Air Quality Management District
5	11/18/03	East Bay Regional Park District
		LOCAL AGENCIES
6	12/12/03	City of San Pablo
7	12/22/03	Contra Costa Environmental Health
8	12/22/03	West Contra Costa Integrated Waste Management Authority
9	12/22/03	The Beautification Committee of North Richmond
		ORGANIZATIONS
10	12/08/03	Richmond Chamber of Commerce
11	12/19/03	Save San Francisco Bay Association
12	12/18/03	Sierra Club
13	11/23/03	Trails for Richmond Action Committee

Letter No.	Date	Source
14	12/22/03	Trails for Richmond Action Committee
15	12/02/03	West County Toxics Coalition
		INDIVIDUALS
16	12/23/03	Eric Bledsoe, Electronic Innovations, Inc,
17	12/22/03	Larry Burch, West Contra Costa Sanitary Landfill, Inc.
		TRANSCRIPT
18	11/25/03	Public Hearing on Draft EIR



Arnold  
Schwarzenegger  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit

03 DEC 23 PM 1:59



Jan Boel  
Acting Deputy  
Director

December 22, 2003

Deidra Dingman  
Contra Costa County  
651 Pine St., North Wing,  
4th Floor  
Martinez, CA 94553

Subject: Proposed Amendment of LUP# 022026 for BMPC at WCCSL  
SCH#: 2002102057

Dear Deidra Dingman:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 19, 2003, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

1-1

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2002102057  
**Project Title** Proposed Amendment of LUP# 022026 for BMPC at WCCSL  
**Lead Agency** Contra Costa County

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**Type** EIR Draft EIR  
**Description** WCCSL is requesting amendments to its existing land use permits (LUP) for its Bulk Materials Processing Center.

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**Lead Agency Contact**

**Name** Deidra Dingman  
**Agency** Contra Costa County  
**Phone** 925-335-1224 **Fax**  
**email**  
**Address** 651 Pine St., North Wing,  
4th Floor  
**City** Martinez **State** CA **Zip** 94553

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**Project Location**

**County** Contra Costa  
**City**  
**Region**  
**Cross Streets** Parr Blvd. & Richmond Pkwy.  
**Parcel No.** 408-140-013, 008-010  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use** Industrial / M-1 / P-1

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**Project Issues** Aesthetic/Visual; Air Quality; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Solid Waste; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects

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**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Fish and Game, Region 3; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Department of Health Services; Integrated Waste Management Board; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

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**Date Received** 11/05/2003 **Start of Review** 11/05/2003 **End of Review** 12/19/2003

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**LETTER  
#1  
RESPONSE**

California Governor's Office of Planning and Research  
Terry Roberts, Director of State Clearinghouse  
December 22, 2003

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- 1-1 This letter acknowledges that copies of the Draft EIR were distributed to selected state agencies for review. The letter further acknowledges that the Lead Agency has complied with the State Clearinghouse review requirements for environmental documents, pursuant to the California Environmental Quality Act (CEQA). No additional response is required.



# California Integrated Waste Management Board

Linda Moulton-Patterson, Chair  
 1001 I Street • Sacramento, California 95814 • (916) 341-6000  
 Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025  
[www.ciwmb.ca.gov](http://www.ciwmb.ca.gov)

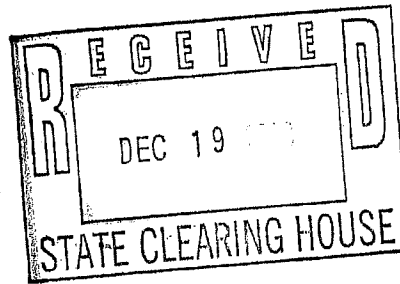


Arnold Schwarzenegger  
 Governor

Terry Tamminen  
 Secretary for  
 Environmental  
 Protection

December 18, 2003

Ms. Deidra Dingman  
 Contra Costa County  
 651 Pine Street, 4<sup>th</sup> Floor, North Wing  
 Martinez, California 94553-0095



Clear  
 12-19-03  
 e

**Subject: State Clearinghouse No. 2002102057** Draft Environmental Impact Report for the Bulk Materials Processing Center and Related Actions located at the West Contra Costa Sanitary Landfill, Solid Waste Information System No. 07-AA-0001, Contra Costa County

Dear Ms. Dingman:

The California Integrated Waste Management Board (CIWMB or Board) Environmental Review (ER) staff has reviewed the environmental document cited above. The following is an overview of the CIWMB role in the California Environmental Quality Act (CEQA) process, the project description for the proposed project, and the ER staff analysis and recommendations for the proposed project based on ER staff's understanding of the project, as described in the above document(s).

## DEIR PROJECT DESCRIPTION

CIWMB ER staff have reviewed the DEIR and submit the following project description of the proposed project. If this project description varies substantially from the project as understood by the lead agency, ER staff request that the lead agency notify ER staff of any significant differences prior to preparation of the DEIR.

The Contra Costa County Community Development Department, acting as lead agency, has prepared and circulated a DEIR in order to comply with CEQA, and to provide information to, and solicit consultation with responsible agencies in the approval of the proposed project.

West Contra Costa Sanitary Landfill, Inc. (WCCSL), operates a Class II sanitary landfill located at the foot of Parr Boulevard, City of Richmond. The site encompasses land in both the City of Richmond and Contra Costa County. The City/County boundaries pass west to east through the WCCSL site. The WCCSL site has been in operation since 1952. Currently the site consists of several distinct operations that function as a cohesive whole.

2-0



These operations include:

- Solid Waste Disposal in a Class II municipal solid waste landfill
- Waste Shuttle Facility
- Bulk Materials Processing Center (BMPC) comprised of:
  - Wood Recycling Facility
  - Composting Facility
  - Asphalt/Concrete Crushing Facility
- Hazardous Waste Management Facility (Closure Plan in progress)
- Hazardous Waste Management Facility Leachate Treatment Plant
- Barge Mooring Area (not in operation at this time)
- Soil Remediation Facility – Operation will be discontinued

WCCSL is currently permitted to receive up to a maximum of 2,500 tons per day of municipal solid wastes (MSW) from various jurisdictions in the San Francisco Bay Area. Wastes are delivered in large transfer trucks, garbage trucks, pickups, and passenger vehicles.

### **Proposed Project Design and Operational Changes**

#### **Bulk Materials Processing Center (BMPC)**

##### **Compost Facility Operations**

Increase in the volume of compostable materials and mulch to be processed at the facility. Proposed permitted quantities would increase from 10,000 tons per-year of green materials to 164,300 tons per year of green materials and “organic feedstock”. Organic feedstock would include food wastes, bio-solids (wastewater sludge), mixed waste paper, and agricultural “residues”. There could be a maximum of 94,400 total tons of all materials on site at any one time. This maximum would include 56,000 tons of materials undergoing composting; 12,800 tons of unscreened compost products in storage; and, 25,600 tons of finished, screened, compost product in storage.

The applicant has allocated 20 acres for the Composting Facility that includes a “flexible” boundary that could increase the area to 40 acres based upon market demands and needs. Finished compost will be sold to the public, to wholesalers, or used at the WCCSL for various purposes.

##### **Concrete Processing and Asphalt Crushing Facility**

The facility will be relocated to the western plateau of the landfill’s central ridge such that the operation would be located in the City and the County. Increase the maximum amount of concrete and asphalt rubble materials processed from 125,000 tons per year to 528,000 tons per year. Remove restrictions on wet weather processing or storage of asphalt. The boundary of the facility is proposed to be “flexible” which would result in the physical area varying from 15 to 30 acres. Processes materials will be sold to the public and wholesalers.

##### **Wood Recovery Facility**

This existing facility is currently in the City, but may expand into the County. The facility currently processes about 30,000 tons per year and is proposed to expand to 131,400 tons per year. Material would



be shredded used in the composting process, used as boiler fuel, or as landscaping and erosion control mulch.

#### Waste Recycling Center and Transfer Station

The applicant proposes to construct and operate a Waste Recycling Center and Transfer Facility (WRC) that will replace the existing Waste Shuttle Facility. The WRC operations include a materials recovery facility, transfer station, public buy-back center, a household hazardous waste collection facility. There will be an organic materials processing area on the landfill's central plateau with separate sub-areas for receipt of green waste, wood waste, food waste, agricultural waste, bio-solids, mixed waste paper, and soil; and a mixed waste processing area, which would provide for processing and removal of recyclables and a transfer vehicle load-out area.

Under the proposed project, the WRC will receive a maximum of 1,000 tons per day (TPD), averaged over a 7-day period, of self-haul, non-franchised waste and new business (third party market opportunities). The existing Soil Remediation Building located within the County will be rehabilitated and expanded to accommodate the WRC mixed waste processing area. The DEIR evaluates for an alternative location in area A of the WCCSL as well for the WRC facilities.

#### Wet Waste/Dusty Material Processing Facility

Establish a new wet waste/dusty material processing operation. The process involves receiving high-moisture content mud and sludge, then blending them in containers with waste soil or dusty wastes. The blended materials will be used at the WCCSL for alternative daily cover, or for final cover. A maximum of 51,100 tons per year of materials would be processed at the facility. This Wet/Dusty Material Blending Facility would be located within the City at the existing Waste Shuttle Facility and anticipated by the applicant to be composed of existing cargo containers with a flat truss roof.

#### Soil Reclamation Facility

Establish soil reclamation and processing operation that will involve the reclamation of non-contaminated soils in an area adjacent to the composting and wood waste recovery operations. The soils are currently delivered daily to the WCCSL site and used as landfill cover material. About 195,000 tons of soil would be processed annually.

#### Biosolids and Dredged Material Spreading

This operation would involve the spreading of wet dredged materials and/or Biosolids (wastewater sludge) from the adjacent West County Wastewater District treatment plant on the southern or eastern side slopes of the closed landfill. Layers of materials would be spread down the side slopes and dried by wind and sunlight. The applicant projects that a maximum of 50,000 tons of these materials could be accommodated annually.

#### Changes in Facility Operating Hours

Operation	Current Hours	Proposed Permitted Hours
Equipment Maintenance	Monday-Saturday, 7 a.m. to 6 p.m.	Monday-Saturday, 5 a.m. to 10 p.m.
BMPC materials transport	Daily, 7 a.m. to 5 p.m.	Daily, 24 hour a day
Concrete/Asphalt Processing	Monday-Saturday, 7 a.m. to 5 p.m.	Monday-Saturday, 5 a.m. to 12 a.m.
Wood Chipping/Grinding	Daily, 7 a.m. to 5 p.m.	To: Daily, 5 a.m. to 12 a.m.
WRC Operations	Not now included	To: Daily, 24 hours a day

### Summary of Proposed Tonnage Increases and Change in Location for WCCSL Bulk Materials Processing Center

Facility	Existing Permitted Tonnages	Proposed Permitted Maximum Tonnage	Proposed Location
Composting	10,000 tons per year (TPY) received, 5,000 tons on site at any time.	56,000 undergoing composting, 12,800 - storage, 25,600 finished screed product, 164,300 processed per year	Expand to area primarily in City
Concrete & Asphalt Processing	30,000 TPY concrete debris and 1,600 TPY asphalt on site at any one time.	175,000 tons unprocessed broken concrete or asphalt rubble in storage, 95,000 tons crushed concrete/asphalt products in storage, 528,000 tons concrete and asphalt processed per year.	Majority of the operation in the City, some in County
Waste Recycling Center	Not now included	1,000 tons mixed solid wastes on site and 365,000 tons mixed waste processed per year	In County (City location proposed alternative)
Wet/Dusty Material Blending	Not now included	5,000 tons and 10,000 gallons of unprocessed materials in storage, 44,900 tons and 1.5 million gallons materials processed per year, 25,400 tons/dry, 25,700 gallons/wet waste processed per year	In County or City
Wood Recovery	350 TPY materials on site at any one time	25,000 tons unprocessed wood waste and 22,000 tons shredded wood and mulch products in storage, 131,400 tons wood wastes processed per year.	
Soil Reclamation	Not now included	20,000 tons material to be processed and 6,500 tons processed material in storage. 195,000 tons processed per year.	City
All Facilities	Total materials not to exceed 46,950 tons per year	1,409,000 tons of processed materials and 25,700 gallons of wet waste processed per year	

### Class II Landfill Height Increase

Increase in the permitted height of the landfill from 120 feet above mean-sea-level (MSL) to 160 feet above MSL. The 30-foot increase in the height of the landfill will include 7 feet of soil layer consisting of 4 feet of final cover and 3 feet of residual soil.

### Public Access Trail

The concept of a Public Access Trail around the perimeter of the landfill property has been envisioned for many years. The Trail would be implemented in four phases and is proposed to follow existing levee roads around the outer edge of the WCCSL property. Development of the Trail will include upgrading and protecting the landfill's environmental control system, building fences to restrict unauthorized access

to off-limit areas of the property, a parking area, a compacted gravel surface, fencing and access controls, appropriate signage and interpretive aids, bench and rest areas, and restroom facilities.

Trail Segment	Projected Opening Date
Phase One	December 1, 2003
Phase Two	December 1, 2004
Phase Three	December 1, 2005
Phase Four	9 months after securing funding

Many aspects of the proposed Public Access Trail are controversial such as the proposal of the applicant to spray-apply liquid biosolids to selected final landfill side slopes near the area of the Trail.

### **CALIFORNIA ENVIRONMENTAL QUALITY ACT REVIEW**

When reviewing an environmental document (ED) during the CEQA circulation process, Board Environmental Review staff will analyze and evaluate whether the proposed ED clearly describes all phases of the project, and assess all potential primary and secondary impacts to public health, safety, and the environment that could occur by the implementation of the project.

When the proposed Solid Waste Facility Permit (SWFP), and the citation of evidence of CEQA compliance by the Local Enforcement Agency is received by the CIWMB, a subsequent analysis is performed by ER staff to evaluate *whether the cited ED supports the requested specifications and conditions of the SWFP*.

ER staff will then make a recommendation to the CIWMB regarding the adequacy of the ED for SWFP concurrence purposes. The Board members will make the final determination of the adequacy of the ED for SWFP concurrence, as well as whether or not to concur in issuance of the SWFP.

### **CIWMB STAFF COMMENTS**

As a responsible agency for Solid Waste Facility Permit (SWFP) concurrence, CIWMB staff will conduct an environmental analysis for this project, using the DEIR developed by the lead agency, in accordance with CEQA Guidelines Title 14 CCR, §15096. The Final Environmental Impact Report (FEIR) should address all the requirements listed in Title 14 CCR, §§15120 – 15132. The proposed project will require new Solid Waste Facility Permits for the Bulk Materials Processing Center and Waste Recycling Center, and a revised SWFP for the landfill expansion.

To assist ER staff analysis and evaluation of this project, and to aid in the determination of the adequacy of the EIR for permit purposes, we request that the following comments be addressed in the FEIR prior to certification by the lead agency. If these questions have already been addressed in an existing document, please indicate the document, page number(s) and section(s), and incorporate this information into the FEIR, prior to certification. Please note that the final evaluation regarding the adequacy of the environmental document cited for CIWMB permit purposes, will be determined only after the proposed permit is received, and compared to the final version of the EIR.

### WCCSL Increase in Tonnage

Provisions in the design and operation of the facility that assure compliance with Solid Waste Regulations should be described in the FEIR and Joint Technical Document (JTD) in order to indicate the ability of the facility to meet State Minimum Standards for environmental protection. If the WCCSL plans to receive any waste from outside of Contra Costa County, the final environmental document should contain the locations where waste will be traveling from, and a detailed analysis of, and mitigation for, all possible associated impacts from the receipt of this waste. 2-1

### Traffic and Related Transportation System Impacts

In the FEIR, please include any addition information and current descriptions, maps, and diagrams of all roads for each of the proposed projects/facilities on the WCCSL site. In addition, as the locations of some proposed projects at WCCSL have yet to be finalized (i.e., WRC facility). In addition, please provide this information for all alternative locations at WCCSL. 2-2

### Odors and Air Quality

The DEIR states that the composting facility proposes to eventually replace the windrow composting method entirely with the open Aerated Static Pile (ASP) method of composting. Please be aware that composting putrescible feedstock using the open aerated static pile method creates potentially significant odor problems when not properly managed. The open ASP method can develop pockets of high moisture content that causes significant odor problems when the oxygen supply has been deprived, and the indigenous microorganisms' metabolism starts the anaerobic digestion of organic material. Additional measures must be taken to mitigate this potential for odor generation (e.g. backup equipment, additional bulking agent, etc.). The proposed increases in waste and the addition of putrescible materials being composted at WCCSL could greatly increase the possibility of odor impacts. 2-3

New Compost Regulations California Code of Regulations (CCR) Title 14, Section 17863.4(a); Odor Impact Minimization Plan (OIMP) requires all compostable material handling operations and facilities to prepare, implement, and maintain a site-specific OIMP. *A complete plan will be a required submittal to the LEA along with the Enforcement Agency Notification and permit application.* The entire text for the regulations can be viewed at: <http://www.ciwmb.ca.gov/Regulations/Title14/ch31.htm#article3> 2-4

The project site is in a "non-attainment" region for ozone. The Bay Area Air Quality Management District (BAAQMD) is responsible for prioritizing facilities that emit air toxics. 2-5

### Composted Final Product

The FEIR should include a description how compliance with Composting Operations Regulatory Requirements, Environmental Health Standards CCR Title 14 §§17868.1 – 17868.4 would be met for the final compost product from the proposed facility. In order to ensure safe, acceptable levels of pathogens in the final compost product, the FEIR should explain in detail the sampling method, and the frequency of sampling, that will be performed. In addition, please provide details as to the potential markets for the final composted product, and what will be done with product that does not meet minimum standards for 2-6

marketing. In addition, please indicate what sort of mitigation is proposed to prevent excessive accumulation of finished product in the event that the finished product has no market, or insufficient markets.

### Changes in Facility Design and Overburden Impacts

Proposed changes to facility design at WCCSL include the location of projects/facilities over waste fill areas. These actions could result in overburden impacts to landfill gas and leachate production, migration and containment systems that should be considered *prior* to implementation of these projects. The primary concern for structures built on, or near fill areas is the prevention of gas migration into the structures. Please include in the FEIR the final location of all proposed projects/structures/facilities on-site, especially in relation to covered waste/fill areas, how the structures will be designed to prevent gas infiltration and, whether gas sensors will be used to ensure protection from gas migration. Please include what provision are, or will be in place for the prevention of landfill gas migration into the Soil Remediation Building currently on site, and if gas sensors will be used as well.

2-9

If any additional waste, or proposed facilities will be located on top of, or near fill areas of the landfill, the following regulations should be considered:

2-10

- Title 14, CCR, §17865, Composting Operation/Facility Siting/Design Standards on Landfills,
- Title 27 CCR, §21190(g) Post Closure Land Use
- Title 27 CCR, §§20919 – 20921 Gas Monitoring/Control at Active and Closed Disposal Sites

For technical assistance, please contact Mike Wochnick of the Remediation, Closure, and Technical Services Branch at (916) 341-6328, or e-mail at [mwochnic@ciwmb.ca.gov](mailto:mwochnic@ciwmb.ca.gov).

### Alternate Daily Cover (ADC)

WCCSL has had a history of problems relating to inadequate cover of waste from the use of ADC at the facility. ER staff suggests that the use of ADC be re-evaluated for adequacy at the facility, and that ADC regulations be strictly adhered to if the facility proposes the continued use of ADC in the future at the facility. The FEIR should indicate the source, final proposed location, and size of ADC stockpiles that will be stored on the landfill site. Please note that any materials used at a landfill for ADC must be approved by the enforcement agency (EA), and will require concurrence by the CIWMB.

2-11

If the use of sludge will continue to be used on slopes near the proposed Public Access Trail, the FEIR should describe what measures will be implemented in order to protect the public from windborne particulates, and possible pathogen levels from the sludge if used in this area. Please also refer to Title 27 CCR §20690(b)(4), which states:

2-12

(A) Public contact with sludge or sludge-derived materials, either alone or blended with soil, ash, processed green material, or stabilization agents such as lime, lime kiln dust, or cement kiln dust, shall be prohibited. This prohibition shall apply to staging, processing, tipping, and cover placement areas.

(B) Sludge or sludge-derived materials, either alone or blended with soil, processed green material, ash, or stabilization agents such as lime, lime kiln dust, or cement kiln dust, shall form a compacted material

which can be placed without forming open voids or causing material to be tracked off the working face area.

### New and Pending Regulations

Please see the regulations area on our website (<http://www.ciwmb.ca.gov/Rulemaking/>) which contains information on additional pending and new regulations that may affect this facility. These proposed and new/current regulations will require:

2-13

- Revision of existing regulations that control the use of alternative daily cover (ADC) materials at solid waste landfills and the reporting of that use,
- Placement of facilities and operations handling construction and demolition (C&D) and/or inert debris into regulatory tiers and setting minimum standards,
- New regulations for the administration of a landfill closure loan program, and

### Cumulative Impacts

It is important that the FEIR address all cumulative impacts resulting from the individual/proposed project(s) and the combined projects, as well as incremental impacts resulting from the proposed projects' implementation.

2-14

### Sudden Oak Death

Please be aware that many counties in California, including Contra Costa, are currently undergoing an epidemic of a plant pathogen that is highly destructive to native oaks and many other hardwoods (Phytophthora ramorum). Composting facilities can act as dispersal centers for diseases such as this one if appropriate measures are not instituted. If material from an infected county is brought to a composting facility, it may then be transferred to uninfected areas through local sales of compost products. Federal and State regulations restrict the movement of plant materials in infected areas, and recent changes to Code of Federal Regulations Title 7, part 301 (Sections 301-92 through 92-10) specifically address Phytophthora ramorum. For further information on this, please see The California Oak Mortality Task Force's website: <http://www.suddenoakdeath.org/>

2-15

### Closure Plan

Please note the CIWMB has revised the regulations concerning closure and post-closure maintenance. *The revised regulations will require the preliminary closure plan to be approved before the issuance of a revised SWFP.* For a full text of these regulations see the Rulemaking Archives on our website: <http://www.ciwmb.ca.gov/RuleArchive/2003/Closure/>

2-16

### Land Use Compatibility

The project's surrounding land use must be designated as compatible with the proposed and current land uses at the project sites. The local government(s), in whose jurisdiction the facilities will be located, must make a finding that the facility is consistent with the General Plan, Public Resources Code (PRC) §50000, and is identified in the most recent County Integrated/Solid Waste Management Plan (PRC §50001).

2-17

## **Mitigation Reporting or Monitoring Program**

Public Resources Code (PRC) §21081.6 requires that the Lead Agency submit a Mitigation Reporting or Monitoring Program (MRMP) at the time of local certification of the Final Environmental Impact Report (FEIR). This Program should identify the environmental impacts associated with the proposed project, identify mitigation measures to reduce impacts to a less than significant level, identify agencies responsible for ensuring the implementation of the proposed mitigations, and specify a monitoring and tracking mechanism. PRC §21080(c)(2) requires that mitigation measures "...avoid the effects or mitigate the effects to the point where clearly no significant effect on the environment would occur." The MRMP is required to be made a condition of project approval.

2-18

Recent changes to PRC §21081.6(b) require that "A public agency shall provide the measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures." The MRMP should indicate that agencies designated to enforce mitigation measures in the FEIR have reviewed the MRMP, and have agreed that they have the authority, and the means, to accomplish the designated enforcement responsibilities.

## **ALTERNATIVES TO THE PROPOSED PROJECT**

If proposed today as a new facility in California, the West Contra Costa Sanitary Landfill (WCCSL) would not have been located in such an environmentally sensitive area as it is now situated. Due to the location of WCCSL, and the concerns from the community, environmental groups and regulatory agencies, ER staff would like to take this opportunity to strongly encourage the project sponsor to seriously consider implementation and/or integration of alternatives to the proposed project, all or in part, as outlined in the DEIR. In particular, the "Preferred Environmental Alternative" should be seriously considered. Adoption or integration of this alternative may help to reduce the significant impacts from the proposed project, as it is currently defined.

2-19

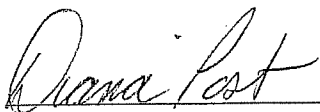
## **CONCLUSION**

CIWMB ER staff would like to thank the lead agency for the opportunity to review the proposed project. ERS staff hopes that this comment letter will be useful to the lead agency in carrying out their responsibilities in the CEQA process. Please note that ER staff may be available to attend consultation meetings and/or workshops planned for the preparation of any Environmental documents.

CIWMB ER staff request copies of any subsequent Environmental documents including, the Final Environmental Impact Report, the Report of Facility Information, any Statements of Overriding Considerations, copies of public notices, and Notices of Determination for this project. If the environmental document for this proposed project is certified during a public hearing, ER staff request notice and location of this meeting two weeks in advance. If the document is certified without a public hearing, ER staff request notification two weeks in advance of the date of the certification, and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me by telephone: (916) 341-6727, or  
e-mail: [dpost@ciwmb.ca.gov](mailto:dpost@ciwmb.ca.gov)

Sincerely,



**Diana Post**, Environmental Review Staff  
Permitting and Inspection Branch  
Permitting and Enforcement Division  
**California Integrated Waste Management Board**

PC: Ken Stuart, Director  
County of Contra Costa Health Services Dept  
Environmental Health Division  
2120 Diamond Blvd Ste 200  
Concord, CA 94520

Beatrice Poroli, Integrated Waste Management Specialist  
Permitting and Inspection Branch  
Permitting and Enforcement Division  
California Integrated Waste Management Board

Mary Madison-Johnson, Supervisor,  
Permitting and Inspection Branch  
Permitting and Enforcement Division  
California Integrated Waste Management Board

Christopher Fong, Waste Management Engineer  
Permitting and Enforcement Division  
Remediation, Closure and Technical Services Branch  
Closure and Technical Services Section  
California Integrated Waste Management Board



**LETTER  
#2  
RESPONSE**

California Integrated Waste Management Board  
Diana Post, Environmental Review Staff  
December 18, 2003

---

- 2-0. This comment requests notification of any significant differences from staff's understanding of the Project as listed in pages 1 through 5 of the CIWMB comments. The following is provided as clarification:
- As listed in Draft EIR Table 3-3, the WRC Mixed Waste Processing Area may receive a peak amount of 1,400 tons per day and an average of 1,000 tons per day averaged over a 7-day period (TPD7). The WRC Organics Receiving Area may receive a peak amount of 1,134 tons per day and an average of 810 tons per day. Thus, the total amount of wastes received at the WRC may be a peak amount of 2,534 tons per day and an average amount of 1,810 tons per day.
  - The roofed cargo containers for the Wet/Dusty Material Blending Area are but one option for the type of enclosure to be used. See Draft EIR Appendix 3E for more information.
  - Other wastewater treatment facilities (WWTF) may be served in addition to the West County Wastewater District (e.g., City of Richmond WWTF).
  - Current permitted maximum height of the Class II site is 130 ft elevation mean sea level (MSL) and not 120 ft (120 ft was the pre-1996 limit). As described in the RDSI, an overbuild of 10 feet is provided to account for future settlement conditions.
  - With respect to the dates when the WCL Public Access Trail (Trail) segments may be opened, based upon permitting schedules known as of February 2004, the Phase I Trail segment projected opening date likely will be early summer 2004.
- 2-1. This comment recommends that the Final EIR and JTD include descriptions of the design and operational provisions of the facility that assure compliance with solid waste regulations and the ability to meet State Minimum Standards for environmental protection. It is the Applicant's intention for continued compliance with State Minimum Standards for environmental protection as will be stipulated in revised/new permits for the Project as described on page 3-43 of the Draft EIR. The JTD for the facility will detail the regulatory requirements and how the facility design and operation will assure compliance. Each chapter of the Draft EIR provides a description of the regulatory and planning framework for the Project which includes a summary of appropriate State Minimum Standards.
- 2-2. This comment suggests that the Final EIR should identify locations of waste originating outside of Contra Costa County and include an analysis of possible impacts and

mitigation measures associated with receipt of this waste. Currently, the WCCSL receives municipal solid waste and recyclable products from various jurisdictions in the San Francisco Bay Area region as described on page 3-3 of the Draft EIR. Under appropriate permits, the WCCSL will continue to receive such materials. Additionally, the existing waste streams, exclusive of the landfill waste, will be expanded and new materials will be received as described in Table 3-1 of the Draft EIR. Much of this increase would be associated with “new business,” the origin of which cannot be determined at this time. However, the Draft EIR contains projections of this waste stream over time and includes an analysis in appropriate chapters of potential impacts and mitigation measures for the WCCSL site, the Richmond Parkway, and the Richmond Parkway ramps at I-80/580.

- 2-3. This comment requests that any additional information, maps, or diagrams be included in the Final EIR relative to roads and alternative locations for Project facilities. Figure 3-3 of the Draft EIR is the Site Development Plan and shows the locations of proposed Project facilities, including the alternative WRC site (Area A). Figure 3-5, Site Circulation Plan, has been corrected to show traffic flow to Project facilities which were inadvertently omitted. The revised Figure 3-5 and a new figure showing traffic circulation assuming use of the Area A location for the WRC are included in Chapter 4.
- 2-4. This comment suggests that the aerated static pile (ASP) composting process can be a significant odor source when not properly managed and additional mitigation measures must be taken. The commenter is correct to note that nuisance odor generation could result from an improperly managed ASP composting process. The Draft EIR, however, considers the ASP process to be preferable to the open windrow composting process relative to the types of feedstocks proposed. Development and phasing of the ASP process by the Applicant is described in Section D.1.b of the Draft EIR. Under review and oversight of the Local Enforcement Agency (LEA), the Applicant will be implementing the ASP process initially on a small-scale basis to gain design and operating experience with the various feedstocks under varying climatic conditions. Additional controls, as the commenter suggests, will be identified and implemented as the composting program expands to a full-scale facility. These controls will be incorporated into the Composting Facility Permit by the LEA/CIWMB.
- 2-5. This comment suggests that a site-specific Odor Impact Mitigation Plan (OIMP) is required by new compost regulations. The Applicant’s OIMP, dated April 2003, is included in Appendix 10C of the Draft EIR. The plan will be included in the Enforcement Agency Notification and permit application that will be submitted to the LEA by the Applicant.
- 2-6. This comment correctly notes the Project site is in a “non-attainment” region for ozone. The attainment status of the region is discussed in Chapter 10, Section B1. It is noted that the BAAQMD is responsible for prioritizing facilities that emit air toxics.
- 2-7. This comment requests that the Final EIR should provide further details on monitoring to ensure safe, acceptable levels of pathogens. During the composting process, the

temperatures occurring in the piles and windrows will be monitored consistent with the CIWMB regulations. The sampling requirements adopted by the CIWMB will be met by the sampling location, sampling frequency, and use of qualified laboratories to check for levels of fecal coliform and Salmonella bacteria in the finished compost product.

- 2-8. This comment requests further information on compost markets and manner of handling off-spec products. According to the Applicant, the compost will be marketed in the San Francisco Bay Area, primarily to commercial compost wholesalers. If a batch of compost does not meet the marketing standards due to heavy metal or pathogen levels, the material may be used as an ADC product, recomposted, or placed on the landfill final cover surface as a soil amendment. If markets diminish, the amount of materials received for composting may be reduced. Excess materials will be applied as soil amendment on the HWMF or Class II landfill cap.
- 2-9. This comment expresses concerns over overburden impacts on environmental control systems and landfill gas hazard control. As discussed in the Draft EIR, overburden impacts are not expected to be significant. The structures to be placed on the final capped landfill, with the exception of the WRC at the Soil Storage Building location, are lightweight and pose no overburden impacts. The gas recovery and migration control system to be placed in the expanded building area for the WRC will be designed to withstand the overburden impacts of the new building subbase and structure weights. Design of the WRC at this location will include special attention to protection of the subsurface barrier wall surrounding the HWMF. Figure 3-4 in the Draft EIR has been revised to show which structures are underlain by fill materials and is included in Chapter 4 of this Response Document. See the Response to Comment 7-44 regarding the protection of structures for landfill gas entry.
- 2-10. This comment notes that appropriate regulations will need to be considered if additional waste or proposed facilities are located on top of or near landfill fill area. Comment noted, no additional response is necessary.
- 2-11. This comment relates to the use of ADC materials. The existing SWFP issued by the LEA and CIWMB includes approval of use of various materials. The proposed Project includes the co-use of some materials (e.g., layering of sludge ADC on top of shredded wood ADC). No significant environmental or public health impacts of use of such materials and methods at the WCL have been identified in the Draft EIR. According to the Applicant, the Applicant wishes to continue the use of ADC materials and has agreed to be more diligent in avoiding future inadequate cover conditions. The sources of the ADC materials are from regional San Francisco Bay communities. The location of the stockpiles and relative sizes are listed in the RDSI as being near the active face and supplying several weeks' amounts of ADC materials. Thus, the size of the piles will vary and may range up to an area of 200 ft x 300 ft and 20 feet deep.
- 2-12. This comment requests further information on measures that will be implemented to protect Trail users from aerosol and pathogen exposure due to biosolids application. Impact 11-7 in the Draft EIR addressed the health and safety impacts to Trail users

associated with biosolids application. Various control measures and mitigation measures were identified to reduce potential impacts to less-than-significant levels. With regards to application of sludge from WCWD lagoons, and if it cannot be demonstrated that the sludge is Class A material, the Applicant would need to demonstrate to the RWQCB that the necessary site restrictions will be used to conform to 40 CFR 503 regulations and provide the necessary public health protection. Additionally, it is our understanding that the cited regulation (27 CCR §20690(b)(4)) applies to the use of materials as ADC and not the use of biosolids as soil amendment materials.

- 2-13. This comment provides current information on pending and new regulations that may affect the WCCSL. No response is required.
- 2-14. This comment suggests that cumulative incremental impacts be addressed. Section E of Chapters 4 through 12 discusses cumulative impacts for each environmental issue area. A summary of the cumulative impact analysis is included in Chapter 14, Section A. The incremental impacts of the proposed Project's implementation is reflected in the analysis of future (2008 and 2015) waste stream projections, contained primarily in traffic (Chapter 8 of the Draft EIR), air quality (Chapter 10) and noise (Chapter 12).
- 2-15. This comment discusses the sudden oak death epidemic. Sudden oak is discussed under Impact 11-11 on page 11-36 of the Draft EIR. The Applicant reports that a Compliance Agreement has already been executed with the Contra Costa County Agricultural Commissioner. No further response is necessary.
- 2-16. This comment notes the revised regulations on closure and postclosure maintenance. According to the Applicant, the WCL Class II site Final Closure Plan was approved by the CIWMB, RWQCB and LEA in 1994, and hence the submittal of a preliminary Closure Plan does not apply to the WCL. Revisions to the Closure Plan will be submitted by the Applicant with the application for revision of the landfill SWFP. The LEA has notified the Applicant that no further closure work should be done until the existing Closure Plan has been updated.
- 2-17. This comment identifies the need for land use compatibility between the proposed Project and adjacent land uses. The proposed Project would occur within the boundaries of the existing WCCSL facility. The existing facility is a permitted solid waste management facility conducting landfilling, resource recovery, and bulk materials processing operations. The County General Plan land use designation for the WCCSL is open space (OS) and Class I Waste Disposal; zoning is P-1 Planned Unit Development/North Richmond P-1. The North Richmond P-1 provides that the current Integrated Resource Recovery Facility BMPC Land Use Permits 2054-92 and 2053-92 and amendments shall govern uses permitted for the BMPC project sites rather than this ordinance. The County General Plan and the North Richmond Planned District provide for the continuation of waste disposal and recyclables processing at the WCCSL Class II landfill site closure. The WCCSL is located outside the Urban Limit Line (ULL) as designed in the County General Plan. The WCCSL BMPC is identified in the County Integrated Solid Waste Management Plan, dated December 15, 1993.

- 2-18. This comment outlines the required elements of a Mitigating Reporting or Monitoring Program (MRMP) as defined in the California Public Resources Code §21080(c)2 and §21081.6. The MRMP will be prepared by the Lead Agency (in this case, the County) at the time of making findings on significant effects of the Project identified in the EIR. The WRC component of the proposed Project may occur within the City of Richmond or the unincorporated County area. The MRMP will include all mitigation measures to be adopted or to be made conditions of approval. Responsibilities for monitoring or reporting by a public agency or private entity will be specified. Per CEQA Guidelines Section 15097(b), until the mitigation measures are implemented, the County as Lead Agency is responsible for ensuring the mitigation measures are implemented in accordance with the MRMP.
- 2-19. This comment encourages the Preferred Environmental Alternative (PEA) to be implemented. It is the intention of the Applicant to implement the PEA. The PEA will be conditioned in appropriate permits from the County, City of Richmond, LEA/CIWMB, RWQCB and the BAAQMD.



03 DEC 15 PM 2:40

December 12, 2003

Contra Costa County  
Community Development Department  
651 Pine Street, 4<sup>th</sup> Floor, North Wing  
Martinez, CA 94553  
Attention: Deidra Dingman

**Re: DEIR for WCCSL Bulk Materials Processing Center and Related Actions**

Dear Deidra:

On behalf of the Association of Bay Area Governments (ABAG) and the San Francisco Bay Trail Project, thank you for the opportunity to provide comments on this DEIR.

The Bay Trail Project is a nonprofit organization administered by ABAG that coordinates implementation of the Bay Trail. When complete, the Bay Trail will be a continuous 400-mile network of bicycling and hiking paths that will encircle San Francisco and San Pablo bays in their entirety. It will link the shoreline of all nine Bay Area counties, passing through 47 cities, and will cross seven of the eight toll bridges in the region. To date, 230 miles of the proposed system have been developed.

As described in the DEIR, the Bay Trail is planned to extend around the perimeter of the West County Sanitary Landfill in Richmond. The Bay Trail Project has participated in a multi-year effort to develop a public access plan for this trail alignment. The plan separates the trail into four phases, based on timing for closure of sections of the landfill.

However, the DEIR inaccurately reflects the end point of Phase I in the description on page 3-40 and on Figure 3.7. The loop trail committee endorsed a trail alignment and phasing plan in the February 2002 WCCSL Shoreline Public Access Trail Development Plan, and in this document, Phase I includes a spur extending from the southwest corner of the landfill to the southern breach in the outer levee. This section of the spur trail is incorrectly identified as part of Phase 4 in the DEIR.

3-1

In addition, the DEIR calls for the elimination of the Phase 4 altogether but offers no evidence of a significant environmental impact. The DEIR speculates that the levee between the two breaches along Phase 4 provides "resting, roosting and nesting

substrate for numerous birds." But this statement is not supported with field data that threatened or endangered species nest on the isolated section of the levee. Without this evidence, there is no clear environmental impact.

3-2

The DEIR also recommends planting a barrier of poison oak and California blackberry along the trail as a deterrent to entering the marsh. We do not agree with this recommendation since these plants can cause serious allergic reactions, especially when not recognized in dormant stages. Since this trail will provide scenic views and opportunities for bird watching, a less hostile planting option is more appropriate.

3-3

Again, thank you for the opportunity to comment. Please contact me if you have questions about these comments.

Sincerely,



Laura Thompson  
Bay Trail Planner

cc: Bruce Beyaert, TRAC  
Steve Fiala, East Bay Regional Park District

**LETTER  
#3  
RESPONSE**

Association of Bay Area Governments  
Laura Thompson, Bay Trail Planner  
December 12, 2003

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- 3-1. This comment correctly points out an error in the description of the Public Access Trail (Trail) on page 3-40 and Figure 3-7. This error has been corrected and the corrected figure is included in Chapter 4 of this Response Document.
- 3-2. This comment questions the analysis and conclusion related to the elimination of Phase 4 of the Trail. A number of commenters have expressed concern over the removal of the Phase 4 Trail segment along the outer levee, contending that there is no basis for not including this segment of the shoreline Trail, and requesting that it be kept in the Project. This position was expressed in letters received from ABAG (Letter 3), Save the Bay Association (Letter 11), the Sierra Club (Letter 12), Trails For Richmond Action Committee (TRAC) in Letters 13 and 14, and in testimony received at the public hearing on the Draft EIR on November 25, 2003. This response provides clarifications on the purpose of the proposed Trail, and an expanded discussion of the methodology, policy, and data sources used in the analysis of Impact 9-4, and recommendations of Mitigation Measure 9-4 as presented in the Draft EIR.

### **Purpose and Use of Public Access Trail**

The proposed Trail is not a part of the San Francisco Bay Trail system. It would serve as a spur trail as generally described in the North Richmond Shoreline Specific Plan. This plan is programmatic and does not contain detailed trail design. In addition, the specific plan also anticipated the need for refinement of the Trail alignment and/or improvements as represented by the numerous goals, objectives, and policies related to natural resource protection. The proposed Trail would accomplish the goal of providing public access along the landfill shoreline through development and operation of a trail on private property with on-going industrial uses.

### **Applicable Policies and Codes**

It is the policy of the Fish and Game Commission that:

The preservation, protection and restoration of fish and wildlife resources within the State is of significant public interest and is inseparable from the need to acquire, preserve, protect and restore fish and wildlife habitat to the highest possible level, and to maintain in a state of high productivity those areas that can be most successfully used to sustain fish and wildlife and which will provide appropriate consumptive and nonconsumptive public use. To carry out these purposes, it is essential that a comprehensive program be implemented by the Department to assure that there will be close coordination with state, federal and local planning agencies, including county boards of supervisors and other decision-making entities



in the formulation and implementation of any plans including, but not limited to, county general plans and any modifications to such plans, which may impact fish or wildlife.

- I. Commensurate with this policy, the Commission recognizes that:
  - A. The land resources of the state provide an essential habitat component necessary for the annual renewability and well-being of the state's fish and wildlife resources;
  - B. The land resources are a limited resource subject to increasing demands;
  - C. Conservation, efficient planning and implementation of various land uses are necessary to meet the competing needs of urban communities, industry, agriculture, recreation, and fish and wildlife;
  - D. There is a need for the Department to provide timely consultation with Federal, State and local governments and agencies on land use planning and projects with a view toward resolving conflicts with the Department management plans, programs and other responsibilities; and
  - E. Locally developed regional landscape conservation planning is a forward-looking method which can provide early resolution of land use/wildlife resource protection conflicts and lead to the preservation of essential wildlife habitat while allowing for appropriate growth and economic development.
- II. To provide maximum protection and enhancement of fish and wildlife, the Department shall:
  - A. Promote the development of regional conservation planning at the ecosystem level through active participation in the local development of regional Natural Community Conservation Planning (NCCP) and other forward-looking multiple habitat conservation planning efforts;
  - B. Review, coordinate and provide comments and recommendations on federal, state, local general plans, special plans and proposed projects as appropriate, including the conservation and land use elements adopted by local government pursuant to provisions of Section 65300 et seq., of the Government Code for the purpose of determining the consistency of such plans with Commission policies, and the goals and objectives of the Department's management plans, programs and other responsibilities for the state's fish and wildlife resources. An initial review of local general plans will be completed by January 1986;
  - C. Carry out subsequent reviews of general and special plans and proposed projects and provide appropriate comments and recommendations to the affected federal, state and local government or agency, as needed to assure

such plans remain consistent with the Commission's policies and the Department's management plans, programs and other responsibilities;

- D. Notify the Commission prior to adoption, if possible, but as soon as feasible, when a federal, state or local general or special plan, or a proposed project authorized by such a plan, is determined to be in conflict with Commission policy or the Department's management plans and programs, and would have a significant adverse impact on fish or wildlife resources. In the case of a local agency plans or special projects where changes are made late in the review and comment period or at an adoption hearing, notification of the Commission will be within 30 days following the receipt by the Department of the text of the approved plan or project;
- E. Provide to the Commission as soon as feasible, the Department's remedial action or actions for responding to such findings and determinations or the Department's reasons for finding that no remedial action is necessary. In the case of local agency plans or special projects, notification of the Commission will be within 30 days following the receipt by the Department of the text of the approved plan or project;
- F. Participate in the local land use planning process and project review implemented in connection with the requirements of Section 21,000, et seq. of the Public Resources Code, for the purpose of conserving and protecting fish or wildlife habitat consistent with the Department's management plans, programs and other responsibilities;
- G. Oppose the adoption of plans or portions of plans for land use or approval of proposed projects if, after following diligent efforts to resolve issues affecting fish and wildlife resources, the Department finds such actions are not consistent with the Department's management plans, programs and other responsibilities and will result in significant losses to fish and wildlife resources.

## **California Fish and Game Code**

### **Fish and Game Code Section 1801-1802**

1801. It is hereby declared to be the policy of the state to encourage the preservation, conservation, and maintenance of wildlife resources under the jurisdiction and influence of the state. This policy shall include the following objectives:

- (a) To maintain sufficient populations of all species of wildlife and the habitat necessary to achieve the objectives stated in subdivisions (b), (c), and (d).
- (b) To provide for the beneficial use and enjoyment of wildlife by all citizens of the state.

- (c) To perpetuate all species of wildlife for their intrinsic and ecologic values, as well as for their direct benefits to all persons.
- (d) To provide for aesthetic, educational, and nonappropriative uses of the various wildlife species.
- (e) To maintain diversified recreational uses of wildlife, including the sport of hunting, as proper uses of certain designated species of wildlife, subject to regulations consistent with the maintenance of healthy, viable wildlife resources, the public safety, and a quality outdoor experience.
- (f) To provide for economic contributions to the citizens of the state, through the recognition that wildlife is a renewable resource of the land by which economic return can accrue to the citizens of the state, individually and collectively, through regulated management. Such management shall be consistent with the maintenance of healthy and thriving wildlife resources and the public ownership status of the wildlife resources.
- (g) To alleviate economic losses or public health or safety problems caused by wildlife to the people of the state either individually or collectively. Such resolution shall be in a manner designed to bring the problem within tolerable limits consistent with economic and public health considerations and the objectives stated in subdivisions (a), (b) and (c).
- (h) It is not intended that this policy shall provide any power to regulate natural resources or commercial or other activities connected therewith, except as specifically provided by the Legislature.

1802. The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. The Department, as trustee for fish and wildlife resources, shall consult with lead and responsible agencies and shall provide, as available, the requisite biological expertise to review and comment upon environmental documents and impacts arising from project activities, as those terms are used in the California Environmental Protection Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

## **Wildlife Studies**

Reference was made by one commenter (TRAC Letter 13) to the two-year *Wildlife and Public Access Study, An Ecological Investigation Sponsored by the San Francisco Bay Trail Project* (Trulio and Sokale, 2002), which they believe demonstrates that there is no relationship between human use of trails and bird abundance or diversity and which contend should be applied to conditions of the isolated levee segment. Concern was also expressed over the appropriateness of some of the proposed Trail plantings, particularly the use of poison oak because of the allergic reaction some humans have to oils found in the plant.

The importance of the isolated levee segment is acknowledged on page 9-3 of the Draft EIR. Breaches in the outer levee have isolated an approximately 2,225 linear foot segment and now prevent access by humans and predatory mammals. Secure uplands are very rare along the shoreline of the San Pablo and San Francisco Bay systems, and predation by red fox, grey fox, raccoon, skunk, weasel, and feral cat and dog along most of the shoreline is a constant threat. Because of the water separation to the mainland, the uplands on this isolated levee segment now provide a relatively unique and secure location for resting, roosting, and possibly nesting for numerous birds. Birds are at less risk of disturbance or predation when using this levee segment, and as a result, this feature is well used by a variety of different species. This use was observed during a series of wildlife surveys conducted by LSA (2002), during the field reconnaissance surveys by the EIR biologist, and during the reconnaissance on February 28, 2003 with the local wildlife biologist of the California Department of Fish and Game (DFG), Mr. John Krause.

LSA recommended in their report on the results of wildlife surveys of the site that the Phase 1 alignment of the shoreline Trail was preferable, providing “the best opportunity for wildlife viewing and bay shore access while minimizing disturbance of birds using the habitats onsite and adjacent to the site” (LSA, 2002). Their report concluded that the Phase 4 Trail alignment had the potential to disturb large numbers of waterfowl and shorebirds that roost and feed to the southwest and west of the breakwaters and LSA discouraged use of this alignment.

During the field reconnaissance of the site in February 2003, the EIR biologist and Mr. Krause were in agreement that the Phase 4 Trail segment could have a significant impact on wildlife use of the isolated levee and foraging activity in the adjacent open water and mudflat habitat, based on the findings in the LSA report and observations made during the field visit of site conditions and wildlife activity. The letter prepared by Deidra Dingman, Solid Waste Program Manager for Contra Costa County, acknowledges this concern on the part of Mr. Krause and the desire to eliminate the Phase 4 Trail segment, if feasible (Contra Costa County, 2003). Mitigation Measures 9-4 (a) and (b) were recommended in response to these concerns, to eliminate the proposed Phase 4 Trail segment across the isolated levee segment, and the proposed Phase 1 extension to the north end of the mainland levee which ends at the first levee breach. Visitors would still have views of the shoreline along the Phase 1 alignment from the mainland and the extension to the proposed kayak staging area at the southwestern corner of Area C.

Given the objections expressed by the commenters over implementing these two recommendations, Mr. Krause was consulted during preparation of this Final EIR as part of a conference call on February 11, 2004 involving the EIR biologist, Ms. Dingman, and Mr. Joel Saborio, CDD EIR Coordinator. Mr. Krause confirmed his earlier concerns over disturbance to wildlife use of the isolated levee segment and the need to prevent access on the mainland levee segment between the proposed kayak staging area and levee breach approximately 1,875 linear feet to the north. Mr. Krause repeated his concern about connecting the isolated segment and the ongoing disturbance which would result from improved access by human and/or predatory mammals. Allowing human access along the 1,875 foot long levee segment to the first breach would create a trail system within 500 feet of

over half of Area C, and would contribute to repeated disturbance and possible flushing of birds using this portion of the open water and mudflat habitat on this portion of the site.

Mr. Krause's concerns are outlined in his letter of February 18, 2004, and is presented after this response. The letter summarizes the DFG concerns over the potential impacts of these Phase 4 and Phase 1 improvements, both to the isolated levee segment and the southern half of Area C, and need to prohibit construction of these two segments of the proposed shoreline Trail. He reiterates his recommendation to not construct these segments of the Trail system, options available to visitors which would still allow for a complete shoreline experience with less disturbance to wildlife, and his support of Mitigation Measures 9-4(a) and (b). He also requested that in addition to the recommended signage prohibiting visitor access called for in Mitigation Measure 9-4 (b), that the boundary of the exclusion area be delineated through installation of spit rail fencing or similar barrier to further discourage human access beyond the kayak staging area.

Mr. Krause also expressed concern over the potential for kayak users to enter the system of sloughs in the coastal salt marsh during the active breeding and nesting season for black rail and clapper rail. Both of these special-status species nest and forage along the channel banks, and could be flushed by kayak and canoe access in the channels. This is especially critical during the nesting season (February 1 through August 31) when access should be prohibited. The significance of this potential disturbance would depend on the frequency and duration of access, but could lead to nest abandonment or other significant disruption of rail activity. It was agreed during the conference call that installation of signage at the kayak staging area stating the sensitivity of the marshland and seasonal access restriction was the most effective method of addressing this concern.

In response to the concerns expressed by the CDFG, Mitigation Measure 9-4 on page 9-18 of the Draft EIR is revised as follows:

#### **Mitigation Measure 9-4**

- a) The Phase 4 alignment of the Trail would be eliminated from the proposed Project to avoid the ~~require~~ resulting disturbance to shoreline habitat on this portion of the site and prevent the potential disruption to wildlife habitat and movement along the existing isolated levee segment. The proposed Phase 1 Trail improvements from the southern end of the mainland levee along the west side of Area C to the first breach in the outer levee would also be eliminated from the proposed Project, serving to minimize potential disturbance to approximately half of the open water and mudflat habitat in Area C. Split rail fencing or similar barrier would be installed within 10 yards of the point where the levee narrows north of the proposed kayak staging area.
- b) Permanent signage would be installed as part of the required interpretive program at the southern end of the levee along the west side of Area C which deters visitor access to this segment of the levee. The signage would be installed at 20-foot intervals across the width of the levee, within 10 yards of

the point where the levee narrows north of the proposed kayak staging area. The signage would state:

No Trail Access  
Sensitive Wildlife Habitat  
Visitor Access Prohibited

- c) Permanent signage would be installed as part of the required interpretive program on both sides of the water access at the proposed kayak staging area to inform kayak users that access into the sloughs of the coastal salt marsh to the southeast is prohibited during the nesting season to prevent possible disturbance to rails and other wildlife. The signage would state:

Sensitive Wildlife Habitat  
No Kayak Access to Marshland and Sloughs  
During Bird Nesting Season –  
February 1 through August 31

### **Standards of Significance in Draft EIR**

Several commenters concluded that the recommended restrictions called for in Mitigation Measure 9-4 were unnecessary because no evidence was presented in the Draft EIR that “threatened or endangered species nest on the isolated section of the levee.” These recommendations to eliminate components of the Phase 4 and Phase 1 Trail improvements were made to protect the unique function the isolated levee segment provides as resting, roosting, and possibly nesting habitat to wildlife in general, and to minimize disturbance of waterbird and shorebird use of much of the open water and mudflats in Area C. As indicated under the fourth significance criterion listed on page 9-10 of the Draft EIR, Appendix G of the CEQA Guidelines identify potentially significant environmental effects on biological resource to include “substantial interference with the movement of any native resident or migratory fish or wildlife species of with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.” In addition, Section 15065 of the CEQA Guidelines also state that a lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR be prepared where:

- (a) The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish and wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare or threatened species, or eliminate important examples of the major periods of California history or prehistory.

### Clarification of Conclusion in Impact 9-4

The discussion in the Draft EIR does not assert that implementation of the Phase 4 Trail segment would have a significance impact on special-status species, as suggested by commenters. Instead, the discussion under Impact 9-4 on page 9-16 of the Draft EIR concludes that the improvements would greatly diminish and possibly eliminate use of this levee by many species, which would be a significant impact on existing wildlife habitat functions and values of this portion of the site. A large part of the unique values provided by the isolated levee segment is the upland habitat provided by the levee itself. The *Wildlife and Public Access Study* (Trulio and Sokale, 2002) referred to by the commenters addresses the general relationship between human use of shoreline trails and bird abundance or diversity in the surrounding foraging habitats. It does not address the affects of new Trail construction, or the loss of habitat from Trail construction into a previously inaccessible location, as found with the isolated levee segment on the site. Construction of a trail along the isolated levee segment would completely change the habitat conditions of this feature. The birds which currently use the uplands of the isolated levee for resting, roosting, and possibly nesting, would be affected by the new access by humans and predatory mammals. The levee segment would no longer be secure habitat, and this important function would be lost to the high number of birds which currently use this feature.

- 3-3. This comment questions the proposed use of poison oak and blackberry as vegetative barriers along the Public Access Trail. Considerable concern was also expressed over the appropriateness of using poison oak and blackberry as part of the Trail (Barrier) Planting Recommendations developed by Environmental Stewardship & Planning. Some of the commenters incorrectly state that the Planting Recommendations are contained in Appendix 3K of the Draft EIR, when in fact they are found in Appendix 9A. As stated in the Planting Recommendations, poison oak was recommended for plantings “well off the proposed Trail, so that it does not pose a hazard to Trail users.” The intent was that it would be planted on lower bank areas and adjacent to marshlands, but within the vision of Trail users as a deterrent to potential “bush whackers”. The slough channel along the south side of the Phase 1 segment between the Trail Parking Area and the proposed kayak staging area would prevent access into the marshland by humans, and use of poison oak or other potentially offensive methods does not seem necessary. Objections were also raised over the proposed use of California blackberry (*Rubus ursinus*) in the Planting Recommendations. Unlike the highly invasive, non-native Himalayan blackberry (*Rubus procerus*), California blackberry does not have the same prolific growth habit and would provide excellent protective cover for species such as brush rabbit and black-tailed jackrabbit. It would not pose the potential health risk to Trail users, and would be appropriate in limited quantities as part of the diverse native planting palette. In response to the numerous objections to use of poison oak in the revegetation and barrier plantings, this species has been eliminated from the Bayside Trail Planting Recommendations. Mitigation Measure 9-1 on page 9-14 of the Draft EIR is revised to include the following additional provision:

- g) Due to the possible hazard to Trail users, the Bayside Trail (Barrier) Planting Recommendations would be revised to eliminate poison oak from the revegetation planting palette and from any future landscaping plans for the Project.

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Contra Costa County, 2003, *West Contra Costa Sanitary Landfill, Contra Costa County, Proposed Amendment of Land Use Permit (LP #022026): Summary of Field Visit on February 28, 2003*, letter to Mr. John Krause, Associate Wildlife Biologist, from Deidra Dingman, Solid Waste Program Manager, dated March 10.

LSA, *Results of Wildlife Surveys at the West County Landfill, Richmond, Contra Costa County*, letter to Steve Peterson, Environmental Stewardship and Planning from Timothy Lacy, Project Manager/Wildlife Biologist, April 16.

Trulio, Lynne and Jana Sokale, 2002, Wildlife and Public Access Study, An Ecological Investigation Sponsored by the San Francisco Bay Trail Project, Preliminary Findings: 2 Years of Field Research from the Wildlife and Public Access Study.



**Scheidegger, Paul**

**From:** dding@cd.cccounty.us  
**Sent:** Monday, December 22, 2003 4:29 PM  
**To:** sabenorio@comcast.net; PScheidegger@BrwnCald.com; pscheidegger  
**Subject:** DEIR for the Proposed Amendment of Land Use Permit for West Contra County Sanitary Landfill (SCH # 20222102057)

Below are the comments from the BAAQMD.

~~~~~  
 Sincerely,  
 Deidra Dingman - Solid Waste Program Manager

Contra Costa County Community Development Department  
 651 Pine Street, 4th Floor - North Wing  
 Martinez, CA 94553  
 (925) 335-1224 (Phone)  
 (925) 335-1299 (Fax)

Website: <http://www.co.contra-costa.ca.us/depart/cd/recycle/>  
 E-Mail: dding@cd.cccounty.us -or- dding@cd.co.contra-costa.ca.us

----- Forwarded by Deidra Dingman/CD/CCC on 12/22/2003 04:27 PM -----

|                                                                                                     |                                                                                       |                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>"Barry Young"<br/>         &lt;BYoung@baaqmd.gov&gt;<br/>         v&gt;</p> <p>"Carol Allen"</p> | <p>12/22/2003 03:08 PM</p> <p>of Land Use Permit<br/>         (SCH # 20222102057)</p> | <p>To: &lt;dding@cd.cccounty.us&gt;<br/>         cc: "Steve Hill" &lt;SHill@baaqmd.gov&gt;,<br/>         &lt;CAllen@baaqmd.gov&gt;<br/>         Subject: DEIR for the Proposed Amendment<br/>         for West Contra County Sanitary Landfill</p> |
|-----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Deidra Dingman  
 Solid Waste Program Manager  
 Contra Costa County Community Development Department  
 651 Pine Street  
 4th Floor, North Wing  
 Martinez, CA 94553-0095

Dear Ms. Dingman:

Per our telephone conversation today, we submit the following comments on the Draft EIR for the Proposed Amendment of the Land Use Permit (LP# 0022026) for the Bulk Materials Processing Center and Related Actions at the West Contra Costa Sanitary Landfill (SCH # 2002102057):

On page 10-8, Regulation 6, Particulate Matter and Visible Emissions, should be included under District air quality regulations. 4-1

On page 10-14, Table 10-4, the entry for PM10 emissions of 144.0 lb/day from landfill gas collection does not make any sense to us. Please check this number and change it accordingly. 4-2

Due to other work committments, we were not able to thoroughly review the Draft EIR for this project. If you have any questions on this matter,

please contact me at byoung@baaqmd.gov or at (415) 749-4721.

Very truly yours,  
Barry G. Young  
Principal Air Quality Engineer  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94539

|                                   |
|-----------------------------------|
| <b>LETTER<br/>#4<br/>RESPONSE</b> |
|-----------------------------------|

- 
- 4-1. This comment identifies a specific BAAQMD regulation that should be included in page 10-8, Chapter 10, Air Quality, of the Draft EIR. This correction is included in Chapter 4 of this Responses to Comments Document.
- 4-2. This comment questions the data value of 144.0 lbs/day of PM<sub>10</sub> shown in Table 10-4 on page 10-14 of the Draft EIR. That emission estimate was taken from the BAAQMD Permit for Plant #1840 dated May 14, 2002. Source 15 on the permit is identified as “Landfill with Methane Wells and Collection System.” For clarity, this source has been renamed “Landfill/Collection System” on Tables 10-4, 10-5, and 10-6 of the Draft EIR which are included in Chapter 4 of this Responses to Comments Document.

EAST BAY REGIONAL



PARK DISTRICT

03 NOV 20 PM 2:08

November 18, 2003

Contra Costa County  
Community Development Department  
651 Pine Street, 4<sup>th</sup> Floor, North Wing  
Martinez, CA 94553  
Attention: Deidra Dingman

Re: DEIR for WCCSL Bulk Materials Processing Center and Related  
Actions

## BOARD OF DIRECTORS

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*Pat O'Brien*  
General Manager

Dear Deidra:

Thank you for providing East Bay Regional Park District with the opportunity to comment on this project DEIR.

The project lies adjacent to a planned segment of the San Francisco Bay Trail (Bay Trail) and incorporates a spur of the Bay Trail circling the boundary of the landfill. East Bay Regional Park District has been working with the West Contra Costa Wastewater Agency to extend the Bay Trail from Wildcat Creek to San Pablo Creek, next to the boundary of the landfill. The recently completed engineering/feasibility study identifies the trail alignment and points out the convenient connection to the planned parking area and trail system included in the DEIR for the landfill. This trail connection should be noted in the DEIR as well as the opportunity for shared use of the parking for Bay Trail purposes.

5-1

The Park District operates many miles of shoreline trails, and we have learned many lessons on barrier and trail designs. Based on our experience, we have found that few members of the public gravitate to slogging into a muddy marsh, whereas dogs do not make such choices. Because there will be no access for dogs or other pets along the trail, the need for a barrier planting of blackberry and poison oak seems very unnecessary as proposed in the plan. The attraction of the trail is to view natural areas, not hide them.

5-2

In addition, both blackberry and poison oak are more adapted to and prefer woodland environments with adequate moisture to keep them vital. This location would not likely support that type of planting without irrigation and the on-going and time consuming maintenance associated with managed landscaping. If a barrier is absolutely required, a low profile fence that does not obscure view should be more than enough of a deterrent.

5-3

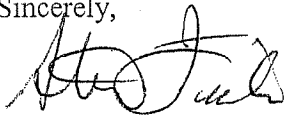


*Ms. D. Dingman*  
*November 18, 2003*  
*Page 2*

The Park District supports the development of a recreation component for this site as the location provides some wonderful bay viewing experiences. The opportunity to connect to a regional trail leading to other destinations, such as Wildcat Creek Trail, and in the future, Pt. Pinole Regional Shoreline, also make this an important piece in Richmond's public shoreline resources.

Again, thank you for the opportunity to comment. Please feel free to contact me should you have questions about any of our design and management strategies for shoreline trails.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Fiala", with a stylized flourish at the end.

Steve Fiala  
Trails Development Program Manager

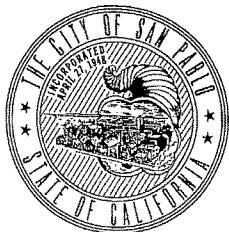
cc: L. Thompson, SF Bay Trail Project  
B. Beyaert, TRAC

**LETTER  
#5  
RESPONSE**

East Bay Regional Park District  
Steve Fiala, Trails Development Program Manager  
December 18, 2003

---

- 5-1. This comment points out that the proposed parking area for the Public Access Trail (Trail) is in close proximity to a possible extension of the Wildcat Creek Trail to San Pablo Creek and thus should be identified as an opportunity for shared parking. Figure 3-7 from the Draft EIR has been revised to show the possible connection points that would link to the western end of the Wildcat Creek Trail.
- 5-2. This comment questions the proposed use of poison oak and blackberry as vegetative barriers along the public access trail. This comment is addressed in Response to Comment 3-3. No additional response is required.
- 5-3. This comment further questions the proposed use of poison oak and blackberry as vegetative barriers along the Public Access Trail, and suggests that a low profile fence may be more appropriate. This comment is addressed in Response to Comment 3-3. No additional response is required.



03 DEC 15 PM 2:39

# CITY OF SAN PABLO

13831 San Pablo Avenue, Bldg. #3  
 San Pablo, California 94806  
 (510) 215-3030 • Fax (510) 215-3031

## Public Works Division

December 12, 2003

Diedra Dingman  
 Contra Costa County  
 Community Development Dept.  
 651 Pine St., 4<sup>th</sup> Floor, North Wing  
 Martinez, CA 94553

Subject: Comments on Draft EIR, WCCSL Bulk Materials Processing Center  
 and Related Actions

Dear Ms. Dingman:

We have the following comments on the EIR for the Proposed Amendment of Land Use Permit # 022026 for the West Contra Costa Sanitary Landfill:

1. Economic impacts should be addressed, especially in terms of the potential for garbage pick up rate increases which we suspect may be necessary to finance the changes covered in the Proposed Amendment. San Pablo is economically depressed in many aspects and increased rates would negatively impact the businesses and residents of San Pablo. 6-1
2. The operation hours of certain facilities are proposed to be increased. Will the public drop off hours at the Landfill accordingly be increased? We are interested since our street sweeper operation is limited by the 3:30 p.m. closing time at the landfill, and a later closing time would be beneficial to the City of San Pablo. 6-2

Yours truly,

Adele Ho  
 Public Works Division Manager

cc: Brock Arner  
 Albert Lopez

**LETTER  
#6  
RESPONSE**

City of San Pablo  
Adele Ho, Public Works Division Manager  
December 12, 2003

---

- 6-1. This comment suggests that potential economic impacts of the Project be addressed in the Draft EIR. Economic effects of a project are not to be treated as significant effects on the environment, according to Section 15131(a) of the California Environmental Quality Act (CEQA) Guidelines. The issue of potential economic impacts is addressed in other public reviews of the Project by the jurisdiction with land use, permitting, or design review authority. The Draft EIR addresses the potential for significant environmental impacts to the natural and physical environment, and not the issue of garbage pickup rates.
- 6-2. This comment inquires whether the public drop-off hours at the landfill will be increased as part of the Project. The current hours when the landfill is open to receive self-hauled wastes are between 8:30 a.m. and 3:30 p.m. on weekdays. According to the Applicant, this time period allows the landfill operators in the morning to prepare the active area to be used that day for disposal, and in the afternoon time to cover the last wastes received prior to the end of the daily work shift. After the WRC is in operation, the daily time period for such waste receipt may be extended since that facility will be ready for operation earlier in the day and will operate into the evening. The Applicant is studying the optimum hours for receipt of the wastes at the WRC.



WILLIAM B. WALKER, M.D.  
HEALTH SERVICES DIRECTOR  
KENNETH C. STUART,  
MSEH, REHS  
ENVIRONMENTAL HEALTH DIRECTOR



CONTRA COSTA  
ENVIRONMENTAL  
HEALTH

2120 Diamond Blvd., Suite 200  
Concord, California  
94520  
Ph (925) 646-5225  
Fax (925) 646-5168  
www.cocoeh.org

December 22, 2003

Contra Costa County  
Community Development Department  
651 Pine Street, 4<sup>th</sup> Floor, North Wing  
Martinez, California 94553  
Attn: Deidra Dingman

Subject: Draft Environmental Impact Report, State Clearinghouse #2002102057  
Proposed Amendment of Land Use Permit (LP#022026) at the West  
Contra Costa Sanitary Landfill, Facility No. 07-AA-0001

Dear Ms. Dingman:

Contra Costa Environmental Health, as the Local Enforcement Agency (LEA) for solid waste and as a responsible agency in this CEQA process, has reviewed the Draft Environmental Impact Report (EIR) for the West Contra Costa Sanitary Landfill (WCCSL) and provides the following comments.

#### COMPOSTING

1. The Aerated Static Pile Composting Demonstration Project would require a CIWMB Notification Tier approval for Research Composting Operations. The LEA will work with the operator for proper approvals and details. The California Code of Regulations, Title 14 Section 17862 describes the limitations placed on this activity. This includes "...shall not have more than 5,000 cubic-yards of feedstock, additives, amendments, chipped and ground material, and compost on-site at any one time..." 7-1
2. On page 3-26 of the EIR, is there a misprint in Table 3-4? For composting, it indicates that 450 TPD of materials are received, 504 TPD are recycled, and 45 TPD are landfilled.  $504 + 45 = 549$ , not 450. 7-2
3. What is the noise impact from the blowers utilized at the aerated static piles? 7-3
4. When the aerated static piles are broken down into windrows for 6 months for stabilization and maturation, what type of monitoring will be conducted to prevent fires, odors, and contamination with uncomposted material that may have pathogens in it? 7-4
5. Provide a drawing that clearly identifies the flexible compost/asphalt/concrete processing facilities boundary. Show the *maximum* western side of the compost operation and *maximum* eastern side of the asphalt/concrete processing facility. 7-5



6. What is the peak amount of compostable materials (feedstock, amendments, additives, final product, etc.) on site at any one time? What happens if it reaches peak capacity? 7-6
7. What type of lighting will be provided for after-dark activities? 7-7

#### ASPHALT/CONCRETE PROCESSING

1. Provide a drawing that clearly identifies the flexible compost/asphalt/concrete processing facilities boundary. Show the *maximum* western side of the compost operation and *maximum* eastern side of the asphalt/concrete processing facility. 7-8
2. What type of lighting will be provided for after-dark activities? 7-9
3. Appendix 3C indicates that wastewater "...not be allowed to pond at the site, *unless under a controlled manner.*" As this operation will be located on top of the closed landfill, and no ponding is allowed under the solid waste regulations, all steps must be taken to prevent ponding. 7-10

#### WASTE RECYCLING CENTER

1. In order to issue a solid waste facility permit (SWFP) for this facility, the LEA needs to make a finding that it is identified in and in conformance with the County Integrated Waste Management Plan (CIWMP). This includes specification of the site location. The CIWMP will need to be amended to include this facility. 7-11
2. What is the maximum capacity of the WRC building (i.e. the maximum amount of wastes and recyclables it can handle at one time)? What happens when the peak amount is reached? A peak amount is needed for the SWFP. 7-12
3. The LEA prefers that the entire WRC operation be enclosed at the beginning of operation. This includes all materials/wastes being unloaded inside the building and having doors that close. This would control litter, odors and vectors and ensure full control of the operation. Phase-in building constructions are difficult to do when a facility is operating 24-hours per day. The construction may be more costly and the operator may decide not to implement the final constructions, therefore not meeting all the LEA requirements. 7-13
4. The LEA prefers that all equipment be installed before waste is accepted at the facility. Installing new equipment after opening can cause safety as well as operational problems. 7-14

5. If for some reason the operator will need to use the Waste Shuttle Facility until the WRC construction is completed, extra precautions may be necessary. Past experience has shown that the sorting line can be dangerous to use in high wind conditions. All safety precautions should be taken when utilizing this facility. 7-15
6. What type of lighting will be provided for after-dark activities? 7-16
7. For the WRC alternative location in AREA A, what is the traffic route from the landfill entrance to this building? Figures 13-2 and 13-3 do not indicate this traffic route. 7-17
8. Figure 13-2 indicates that trees will be planted along the class II site slurry wall. Will these trees be planted far enough away so as root growth will not compromise the slurry wall? What kind of monitoring of the root structure will be done to ensure no damage to the slurry wall? 7-18
9. What kind of restrictions will there be regarding self-haulers exiting their vehicles to unload? Will there be adequate separation from commercial vehicles? Animals and children should not be allowed out of vehicles. 7-19
10. There has been discussion that the soil building will be removed so more waste can be buried in that location.
  - a. What studies and building designs have been developed for placing a new building in this area for use as the WRC? This would also affect the drainage and runoff controls. 7-20
  - b. If this should occur, will the alternative location in AREA A be used for the WRC? 7-21
11. What is the storage time limit for all recyclables recovered in the Mixed Waste Processing Area? These materials should be removed before they become vector and odor problems. 7-22

#### WET/DUSTY MATERIAL BLENDING

1. Page 2 of Appendix 3E lists examples of the types of high-moisture content materials to be processed. Make note that these should all be non-hazardous. What protocol will be used to ensure these materials are non-hazardous? 7-23
2. How will this facility operate during the wet weather season? Will it be able to serve its purpose during this time? 7-24
3. The description states "about 51,000 tons per year of material would be processed." What is the maximum amount of material the operation can handle at any one time? How long will the material be on site? The LEA will need this information for the SWFP. 7-25

4. What is the peak amount of wet/dusty material on site at any one time? What happens if it reaches peak capacity? 7-26

5. The LEA requests a clarification as to when this operation will occur. Is it only while the landfill is still open or will it continue once the landfill is closed? If it continues when the landfill closes, where will the mixed material go? 7-27

6. What type of lighting will be provided for after-dark activities? 7-28

#### WOOD RECOVERY

1. What type of lighting will be provided for after-dark activities? 7-29

#### SOIL RECLAMATION

1. How will this facility operate during the wet weather season? Will it be able to serve its purpose during this time? 7-30

2. What is the peak amount of material on site at any one time? What happens if it reaches peak capacity? 7-31

3. What type of lighting will be provided for after-dark activities? 7-32

#### BIOSOLIDS/DREDGED MATERIAL SPREADING

1. The Regional Water Quality Control Board (RWQCB) oversees the regulation of biosolids and should be included in any approval and demonstration activities. The RWQCB will also need to determine conditions for applying the biosolids and dredged materials to the slopes. 7-33

2. What affect will these operations on the slopes have on the Public Access Trail? Will this material slide down the slope if too wet? 7-34

3. In the description, it indicates that some of the dried biosolids will be scraped off to be used off site, some will be used to add a buffer to the final landfill cap if the cap is scraped down while removing the dried biosolids, and some will be spread on the slopes once a year for erosion control as is currently done to help the growth of plant life. These are acceptable to the LEA. However, the fourth option indicated is to let it remain on the slope when dried (i.e. no removal). This constitutes disposal and will not be allowed by the LEA or CIWMB as the landfill will be closed and unable to accept any more waste for disposal. The RWQCB has stated that no more disposal will be allowed after January 31, 2006. 7-35

Disposal of dredged materials into the landfill is okay while the landfill is still open. But once the landfill is closed, disposal is no longer approved. Dredged materials and biosolids must be removed when dried and either used for landfill cover repairs or sent somewhere else. 7-36

4. IMPACT 11-7 indicates that the biosolids used will be Class B and are not pathogen free. The mitigation measures indicate that the biosolids produced at the WCWD are Class A. Does this mean that WCCSL will only take Class A biosolids? Restrictions to applying the biosolids should consider the protection of employees and the public. 7-37

5. What is the peak amount of biosolids and dredged materials on site at any one time? What happens if it reaches peak capacity? 7-38

6. What type of lighting will be provided for after-dark activities? 7-39

#### LANDFILL

1. Page 3-5 of the EIR indicates that the treated auto shredder waste is currently shredded on-site. The LEA understands that this material arrives at WCCSL already shredded. Shredding this material on-site is not an approved operation in WCCSL's current SWFP. 7-40

2. Page 5-9 of the EIR indicates that the base of the refuse is currently between about elevation 0 and -20 feet msl. During the last SWFP revision, it was indicated that the elevation was -30 feet msl. 7-41

#### PUBLIC ACCESS TRAIL

1. The LEA agrees that no animals/dogs be allowed on the Public Access Trail. 7-42

2. The operator should provide frequent inspections along the portions of the access trail immediately adjacent to the landfill and on the landfill to ensure no damage to the landfill final cap and the fencing preventing trail users from entering active solid waste operations areas. 7-43

#### GENERAL/OVERALL COMMENTS

1. Gas monitoring should be conducted inside *all* structures to be located on the landfill for each proposed operation. This includes *audible* landfill gas/methane detection alarms in buildings that will be occupied by staff. The alarms should be checked frequently to ensure operational status. 7-44

Deidra Dingman  
December 22, 2003  
Page 6 of 6

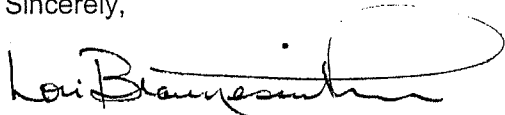
2. The following updates the information provided on page 10-9 of the EIR regarding the composting regulations:

- a. The composting regulations became effective in April 2003.
- b. The LEA received WCCSL's Odor Impact Minimization Plan (OIMP) on April 16, 2003.

7-45

Thank you for the opportunity to review and comment on the draft EIR. Should you have any questions, please contact me at (925) 646-5225 ext. 232.

Sincerely,



Lori Braunesreither, REHS  
Senior Environmental Health Specialist

cc: Diana Post, California Integrated Waste Management Board  
Beatrice Poroli, California Integrated Waste Management Board  
Larry Burch, West Contra Costa Sanitary Landfill

WCCSLdraftEIRcomments1222.2003

**LETTER  
#7  
RESPONSE**

Contra Costa Environmental Health  
Lori Braunesreither, Senior Environmental Health Specialist  
December 22, 2003

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- 7-1. This comment discusses the need and permitting requirements for an aerated static pile (ASP) Composting Demonstration Project. The Draft EIR recommended a demonstration project if open windrow composting were to be used for the proposed feedstocks, but not for the ASP process. As discussed in Chapter 13, Section D1(b), the Applicant is not proposing a demonstration project that would be conducted pursuant to CIWMB Research Composting Operations regulations. The intent of the Project phasing is to allow the composting techniques to be practiced by gradually increasing the types and amounts of materials composted, thereby gaining experience on the processing of the various feedstocks under varied climatic conditions. This approach would more aptly be called a "Pilot Project." The Applicant will be coordinating with the LEA regarding this activity and permitting requirements. The ASP process is used in a number of places in the U.S., including California.
- 7-2. This comment identifies a typographical error in Table 3-4 of the Draft EIR. For composting, the recycle/reuse in TPD should be 405, not 504. This correction is included in Chapter 4 of this Responses to Comments Document.
- 7-3. This comment questions the impact from the ASP blowers. No significant noise is anticipated since the blowers would use electrically driven motors and the sound would be equivalent to the existing blower used for the WCL landfill gas flare. The blowers would be in a fenced enclosure to exclude unauthorized access.
- 7-4. This comment requests further information on ASP monitoring in the compost maturing piles. The compost materials placed in the maturing piles will have been composted to the point where no significant temperature rise would occur during storage that would present the danger of spontaneous combustion. Similarly, no major amount of uncomposted materials would be contained in the maturing piles that would lead to nuisance odor production. The maturing compost is expected to be similar to that normally in process at the facility, which has not been a source of fires or odors, and hence monitoring is not expected to be required. According to the Applicant, the maturing piles would be placed in areas that had been used previously for such piles; the piles would be identified to reduce the chance that uncomposted materials containing pathogens would be mixed with the piled materials.
- 7-5. This comment requests a drawing be included clearly identifying the flexible compost/asphalt/concrete processing facilities boundary. Figure 3-3 from the Draft EIR has been edited to more clearly show the boundaries and is included in Chapter 4 of this Responses to Comments Document.

- 7-6. This comment requests more information on peak quantities of compostible materials. As listed in the Draft Report of Composting Site Information (March 2002), the peak amount of compostible materials (feedstock, amendments, additives, final product, etc.) on site at any one time will be 305,000 cu. yd. The following information from the RCSI provides background information.

The composting site annual operating capacity is estimated to be 305,000 cu. yd. This volume was calculated on the basis of the maximum amount of feedstock, active compost, curing compost, and stockpiled stabilized product on the site at any one time. The estimate of the operating capacity of the WCCSL Composting/Mulch Facility has been developed as shown below:

|                                  |                       |
|----------------------------------|-----------------------|
| Feedstock amount on site         | 59,000 cu. yd.        |
| Active compost windrow amount    | 150,000 cu. yd.       |
| Curing compost amount            | 32,000 cu. yd.        |
| Stabilized compost in stockpiles | <u>64,000 cu. yd.</u> |
| Total operating capacity         | 305,000 cu. yd.       |

The design capacity pursuant to 14 CCR Section 17863(h) is estimated to be 246,000 cu. yd. The estimate of the design capacity of the material flow into and out of the composting facility, which by CIWMB definition (Section 17857) includes only the material undergoing the composting process (active compost and curing compost) and does not include on-site storage of feedstock or stabilized compost, is based upon the following:

|                               |                       |
|-------------------------------|-----------------------|
| Active compost windrow amount | 150,000 cu. yd.       |
| Curing compost amount         | <u>96,000 cu. yd.</u> |
| Total design capacity         | 246,000 cu. yd.       |

The 10-week average composting cycle allows about five 96,000 cu. yd. cycles per year. Thus, the annual processing capacity is about 480,000 cu. yd. The bulk density of the compost in the windrows has been assumed as 750 lbs/cu. yd. and the piled maturing or curing material would be about 800 lbs/cu. yd. The peak rate of compostibles delivery is estimated to be 630 tons in one day.

- 7-7. This comment requests further information on the type of nighttime lighting that would be used at the composting facility. According to the Applicant, possible after-dark activities include placing shredded material into the composting piles or windrows, turning the windrows, and taking materials out of the piles or windrows and placing them into the maturing piles. The windrow compost turner is equipped with lights for nighttime operation. Construction-type light stations may be used if necessary, as are now used at the landfill working face during nighttime operation.

- 7-8. This comment is related to comment 7-5. See response to comment 7-5.



- 7-9. This comment requests further information on the type of nighttime lighting to be used at the concrete/asphalt processing facility. According to the Applicant, possible after-dark activities include receiving asphalt/concrete materials for processing, crushing the materials, maintaining the stockpiles, and loadout of the finished materials. The crusher machine would be equipped with lights for nighttime operation. The skip-loader tractors used to move materials are also equipped with lights for nighttime operation. Construction-type light stations may be used if necessary, as they are now used at the landfill active face during nighttime operation.
- 7-10. This comment emphasizes the importance of preventing ponding in the concrete/asphalt processing facility. The reference to controlled ponding of wastewater from the concrete processing operation in Appendix 3C refers to the capture of excess water from that used in the dust control spray systems on the crusher unit and conveyors. Such wastewater would be captured in pans, lined basins or other controlled areas that will provide assurance that leakage of water will not occur from such areas.
- 7-11. This comment identifies the need to amend the County Integrated Waste Management Plan (CIWMP) to include the facility. Impact 4-4 in Chapter 4 of the Draft EIR identified the need for the County Non-Disposal Facility Element (NDFE) to be amended to include the proposed Waste Recycling Center as a transfer facility. The NDFE is a component of the CIWMP.
- 7-12. This comment requests information on the maximum capacity of the WRC building. As listed in the Transfer/Processing Station Draft Report (January 2003), the peak amount of wastes and recyclable materials within the building at any one time would be 5,500 cubic yards or about 1,400 tons of wastes and 1,000 cubic yards or 200 tons of recyclables.
- 7-13. This comment suggests the entire WRC building be enclosed at the beginning of operation. According to the Applicant, if the building is not ready for occupancy before the landfill active face capacity has diminished and the transfer operations must start, then the existing Shuttle Facility would be equipped with windscreens and litter fencing to allow short-term interim use of that area. With respect to the permanent WRC building, many California transfer stations function effectively with an open-sided building (e.g., Sonoma County transfer station at the Central Landfill site near Petaluma). The later addition of doors should be possible by adding them to a frame that was originally constructed to subsequently allow door installation. The doors could be added one bay at a time, with much of the work scheduled for nighttime when waste deliveries are minimal, thus causing little impact on the waste disposal and handling operations during the construction period.
- 7-14. This comment suggests that all equipment at the WRC be installed at the WRC before waste is accepted. The WRC will be a long-term operating facility. According to the Applicant, new equipment will need to be added either to allow more recycling or to modernize the facility. Examples of such equipment may be a shredder and baler to prepare the waste materials for a balefill-type landfill. The addition of such future

equipment can be accomplished by planning, engineering, fabrication, and installation that should not result in safety or operating problems. The design of the WRC is being planned to incorporate flexibility to allow and accommodate future changes.

- 7-15. This comment relates to interim use of the Waste Shuttle Facility. See response to comment 7-13. The existing sorting line would need to be modified to avoid wind-caused safety problems. Control Measure 11-1(g) has been added to Draft EIR Table 2-1 and to Impact 11-1 in Chapter 11. These additions are included in Chapters 2 and 4 of this Responses to Comments Document.
- 7-16. This comment requests further information on the type of night lighting to be used at the WRC. Lighting will be provided inside the building and at outside areas where operations occur. Poles with streetlights will be installed along the access road areas near the facility. The existing IRRF Processing Facility provides examples of the lighting that is being planned. The Transfer/Processing Station Draft Report (January 2003) describes the lighting.
- 7-17. This comment requests further information on traffic routes for the WRC at the Area A location. See response to comment 2-3. The traffic will pass through the entrance area to the location of the existing scale facility, proceed westward to a junction located near the northwest corner of the HWMF and proceed southward to the Area A location entering at the northwest corner.
- 7-18. This comment questions whether trees planted along the Class II site slurry wall would compromise the wall. Figure 13-2 is intended to show illustrative locations of the trees. The type of trees and setback distance from the wall will be governed by the performance requirement that the root balls of the trees not reach the slurry wall; thus, monitoring would not be necessary.
- 7-19. This comment requests further information on the types of restrictions for self-haulers exiting their vehicles at the WRC to unload. According to the Applicant, these vehicles will be unloaded by the vehicle occupants (adults only). Current WCCSL requirements indicate that children and dogs are to remain inside the vehicles. At the WRC building, the commercial trucks will use one end of the structure and self-haul vehicles will be directed to use the other portion. Traffic spotters will be stationed at the facility to minimize traffic interaction.
- 7-20. This comment requests further information on replacement of the Soil Storage Building with the new WRC Building and what studies and designs have been completed. The Applicant commissioned a consultant firm to prepare a conceptual design on repurposing the existing soil storage building to function as the WRC mixed waste processing facility. This involved retaining the existing building and extending it by 100 feet to the east (see Figure 3-5A in Chapter 4 of this Responses to Comments Document). Entrances and exits would be provided on the north side of the building for self-haul vehicles. Collection vehicles would unload in the new eastern portion of the building. The design was selected to maintain a setback of the facility from the HWMF subsurface barrier.

The floor of the existing building would be covered with additional material to level the paved surface. The drainage pattern around the building would be improved such that the drainage would run away from the building area and flow off the facility to the east and west. If additional design efforts indicate the rehabilitation of the building is impractical, a new structure would be designed and constructed.

The Applicant's discussions regarding replacing the existing building with a new structure are based upon utilizing the existing soil pad. No new wastes would be placed under that building site. Such a redesign would incorporate effective drainage and runoff controls.

- 7-21. This comment asks if the Area A location would be used for the WRC if the soil building is removed and additional waste placed. The Applicant's discussions regarding dismantling the existing building and placing new wastes at the building site assume the selection of Area A as the WRC Mixed Waste Processing Area location. The waste placement would be in the configuration of the full landfill buildout in the soil stockpile building location as shown in the existing WCCSL Closure Plan.
- 7-22. This comment asks what the storage limit time would be for all recyclables in the WRC Mixed Waste Processing Area. According to the Applicant, a performance standard to be incorporated in the Republic Services, Inc. WRC operation policy is that vector and odor problems would be prevented by removing the recyclable materials on a frequent enough basis. This may change during the year as weather conditions dictate (warmer vs. cooler weather). Most of the materials to be handled are non-putrescible wood, cardboard and metals. The Transfer/Processing Station Report (January 2003) provides more information.
- 7-23. This comment notes that high-moisture materials to be received at the Wet/Dusty Material Blending Facility should be non-hazardous and requests further information regarding the waste receiving protocol. The Republic Services, Inc. Bulk Materials Processing Center operation policy will limit the materials to non-hazardous wastes using the existing waste screening protocol (see Appendix A of this Responses to Comments Document).
- 7-24. This comment asks how the Wet/Dusty Material Blending Facility would be operated during the wet weather season. Draft EIR Appendix 3E indicates that the processing may be suspended during wet weather periods, unless the mixing would occur within a covered structure. The materials may be mixed in batches using metal boxes and an excavator, with the boxes covered with tarps during rainfall periods.
- 7-25. This comment requests further information on the maximum materials to be processed at the Wet/Dusty Material Blending Facility. According to the Applicant, this BMPC operation may not be subject to the SWFP (other than to be mentioned in the landfill permit as a co-use of the landfill property). The maximum amounts of materials processed will be governed by the size of the facilities that are provided. The processing will be done in batches. The 51,000 tons per year amount presumed that 130 batches

averaging about 350 tons each would be processed per year. The materials would remain on site to the point where sufficient material had been accumulated to economically move them. It may be possible to process the materials faster than was assumed.

- 7-26. This comment requests further information on the peak quantities to be processed at the Wet/Dusty Material Blending Facility. According to the Applicant, the peak amount of materials processed also would be governed by the size of the facilities that are provided. If the peak capacity is reached, additional wastes would not be received. Consideration may be given at that time to proposing a facility size increase through applicable permit applications.
- 7-27. This comment requests clarification on the operation of the Wet/Dusty Material Blending Facility. According to the Applicant, this is a long-term BMPC facility. It is planned to begin the operation prior to landfill closure with most of the materials utilized as on-site pollution control residue type ADC. After landfill closure, the materials may be useable for regrading under the concrete processing area or they may be removed from the site for ADC use at another landfill.
- 7-28. This comment requests further information on the type of night lighting to be used at the Wet/Dusty Material Blending Facility. According to the Applicant, possible after-dark activities (when wind speeds are normally less than during the daytime) include receiving the materials for processing, mixing the materials, and loadout of the finished materials. The mixing area would be equipped with lights for nighttime operation. The skip-loader tractors used to move materials would also be equipped with lights for nighttime operation. Construction-type light stations may be used if necessary, as are now used at the landfill active face during nighttime hours.
- 7-29. This comment requests further information on the type of night lighting to be used at the Wood Recovery Facility. According to the Applicant, possible after-dark activities include placing shredded material into the storage piles and loadout of materials. The skip-loader tractors used to move materials are equipped with lights for nighttime operation. Construction-type light stations may be used if necessary, as are now used at the landfill active face during nighttime hours.
- 7-30. This comment asks how the Soil Reclamation Facility will be operated during the wet weather season. According to the Applicant, the wet-weather operation is anticipated to be of lesser magnitude since fewer off-site construction activities occur during that period and thus less soil is available for processing. Those loads of soils received during the wet weather will be placed into stockpiles. Concurrently, less soil will be loaded out since the need for such soil will be diminished during wet weather periods. It is envisioned that during the wet weather period the operations primarily will be directed to maintaining the soil stockpiles to preclude ponding of water and to prevent erosion and silt discharge into the Area A drainage channel or the Area B lagoon.
- 7-31. This comment requests further information on the peak quantities to be processed at the Soil Reclamation Facility. According to the Applicant, the peak amounts of materials

processed will be governed by the size of the facilities that are available. If the peak capacity is reached, additional soils will not be received. Consideration may be given at that time to proposing a facility size increase through applicable permit applications.

- 7-32. This comment requests further information on the type of night lighting to be used at the Soil Reclamation Facility. According to the Applicant, possible after-dark activities include placing soil into the stockpiles and loadout of processed soil materials. The skip-loader tractors used to move the soil materials would be equipped with lights for nighttime operation. Construction-type light stations may be used if necessary, as are now used at the landfill active face during nighttime hours.
- 7-33. This comment notes the role of the RWQCB in the regulation of the proposed biosolids application activities. This is noted in Control Measure 6-4(d) and Mitigation Measure 6-4(a) of the Draft EIR. Control Measures 11-7(a-g) and Mitigation Measures 11-7(a-d) also relate to biosolids spreading and the RWQCB's role is defined. It is also recognized that the Applicant can continue existing biosolids application activities without permit amendment. Prior to new activities being undertaken at a rate above the current biosolids and dredged material handling procedures at the WCL, it is expected that WCL, Inc. will apply to the RWQCB for new permit requirements to be met for those changed operations.
- 7-34. This comment questions the effect of biosolids application on the landfill slopes and Public Access Trail (Trail). The dredged material spreading would not occur near the west and north slope Trail segments unless the material is used in a postclosure landfill slope maintenance project. No portion of the Trail would exist along the southern slope spreading area. Control Measure 6-4(d) and Mitigation Measure 6-4(a) in the Draft EIR would address acceptable hydraulic loading rates so that the sideslopes would not be overloaded.
- 7-35. This comment notes that leaving dried biosolids on the landfill sideslopes constitutes disposal and would not be allowed by the LEA or CIWMB. According to the Applicant, the WCL Closure Plan and Postclosure Plan contemplate additional depths of vegetative cover material may be provided to build a thicker final cap on the Class II site (also included in the approved HWMF Postclosure Plan). The planned retention of residual layers of biosolids/soil mixture left on the spreading area would be intended to achieve greater final cap thickness, and thus provide more protective buffer thickness above the low permeability clay layer in the final cap. This is not contemplated by the Applicant to be classified as a "disposal operation." Further discussions with the LEA and CIWMB will be necessary during the permitting process.
- 7-36. This comment also relates to removal of biosolids and dredged materials from the landfill sideslopes. See response to comment 7-35.
- 7-37. This comment relates to whether West County Wastewater District (WCWD) biosolids are Class A or B and the need for protection of employees and the public. The discussion under Impact 11-7 indicates that WCWD biosolids are at least Class B under 40 CFR 503

regulations, but there has been no demonstration whether biosolids from the WCWD would qualify as Class A. Mitigation Measure 11-7b would provide that documentation. Class A biosolids would be considered pathogen-free and would not require the same site restrictions as Class B biosolids for the protection of employees and the public. WCCSL would take Class B biosolids but Mitigation Measure 11-7c would apply.

- 7-38. This comment requests further information on the peak quantities to be processed at the Biosolids/Dredged Material Spreading Facility. According to the Applicant, the peak amounts of materials processed will be governed by the size of the facilities that are available. If the peak capacity is reached, additional materials would not be received. Consideration may be given at that time to proposing a facility size increase through applicable permit applications.
- 7-39. This comment requests further information on the type of night lighting to be used at the Biosolids/Dredged Material Spreading Facility. According to the Applicant, possible after-dark activities include receiving the materials and spreading them down the slopes. The tractor may also move about the slope to break the dried crust on the biosolids and muddy materials. The tractors would be equipped with lights for nighttime operation. Construction-type light stations may be used if necessary, as are now used at the landfill active face during nighttime hours.
- 7-40. This comment clarifies that treated auto shredded waste is not shredded on site and is not an approved operation in WCCSL's current SWFP. This clarification is included Chapter 4 of this Response Document. Additionally, clarifications are included indicating that C&D materials and most of the green material are shredded on site.
- 7-41. This comment correctly notes that the base of the landfill refuse is currently between 0 and -20 feet msl. No response is required.
- 7-42. This comment supports the concept that no animals/dogs be allowed on the Trail. No response is required.
- 7-43. This comment suggests that frequent inspections should be conducted to ensure no damage to the final cap and fencing. The Applicant's Postclosure Plan would include these inspection activities. The Applicant has agreed to include in the revised Postclosure Plan the monitoring activity of frequent inspections along the Trail to ensure damage to the landfill final cap or the security exclusion fencing has not occurred.
- 7-44. This comment suggests that landfill gas monitoring should be conducted inside all structures to be located on the landfill. Impact 11-4 discusses landfill gas migration and the need for monitoring at selected structures. It is the intention of the Applicant to comply with applicable CIWMB landfill gas hazard control regulations at all times. According to the Applicant, some structures (e.g., existing landfill office and scale attendant's office) are installed with an air gap under the building, thus avoiding landfill gas entry into the structure. Air gaps are included at the entrances of the underground wiring conduits to the buildings to preclude gas entry.

- 7-45. This comment correctly notes that the composting regulations became effective in April 2003. This update is included in appropriate Draft EIR text in Chapter 4 of this Response Document. The LEA also notes receipt of the Applicant's OIMP on April 16, 2003. No response is required.



**recyclemore**  
WEST CONTRA COSTA INTEGRATED  
WASTE MANAGEMENT AUTHORITY

December 22, 2003

Deidra Dingman  
Integrated Waste Programs Manager  
Contra Costa County Community Development Department  
651 Pine Street 4<sup>th</sup> Floor, North Wing  
Martinez, CA 94553-0095

**SUBJECT: WCCSL BULK MATERIALS PROCESSING CENTER AND RELATED ACTIONS, DRAFT ENVIRONMENTAL IMPACT REPORT**

Dear Deidra:

Following are comments from the West Contra Costa Integrated Waste Management Authority on the subject EIR. We have looked at the document from the following perspectives:

- Conformance with the CEQA Guidelines;
- Discussion and analysis of the future and future value of the Central IRRF;
- Issues directly related to solid waste and recycling services in the Authority's jurisdiction;
- Matters of concern to the North Richmond and West Contra Costa communities, including environmental justice issues.

The comments are divided into two categories: 1. critical comments directly germane to the Authority's mission; and, 2. broader comments relevant to the larger West County community.

As always, if you have questions about this or any other matter, I welcome your call at (510) 215-3127.

Sincerely,

Steve Devine  
Executive Director

Cc: Board of Directors Infrastructure/Strategic Planning Subcommittee  
Board Chair Letitia Moore  
Director Ed Balico  
Director Gary Bell

Serving: The cities of El Cerrito, Hercules, Pinole, Richmond and San Pablo and Unincorporated West Contra Costa County





# Comments on WCCSL Bulk Materials Processing Center and Related Actions, Draft Environmental Impact Report

## *1. Critical Comments Directly Germane to the Authority's Mission*

### **Alternatives**

#### **No-Project Alternative**

The No-Project Alternative should clearly show the results of project non-approval. This should include a comparison of future conditions with the project, and future conditions without the project. CEQA Guidelines (15126.6 (B) and (C)) states that, "...where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical setting" (15126.6(B)). The following paragraph of the Guidelines states that, "After defining the no project alternative..., the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (15126.6 (C)).

Clearly, in this case, if the project is not approved, the landfill will still be required to close. Therefore, the no-project discussion in the DEIR should discuss the environmental consequences of non-approval of the project by clearly showing the reduction in traffic and air emissions that will result when the landfill closes, and when only those operations currently permitted to operate at the landfill (including the current composting, inerts processing, wood processing, and soil remediation facilities) and at the Central IRRF remain in operation. This will provide the public and decision-makers with clear information on the consequences of project approval and non-approval.

8-1

The no-project alternative analysis includes the statement on page 13-5 that with this alternative, "a large increase in resource recovery processing capacity would not occur... at WCCSL." However, there is no analysis in the document that such capacity is needed. The scale of operations that make up the existing BMPC appears to be sufficient to meet the needs of West Contra Costa County. It is not clear from the DEIR where additional materials might come from if these facilities are expanded to many times their current capacity, as is proposed in the project. It is clear to us, but not discussed in the "Environmental Considerations" or "Comparison with Project" sections of the no-project alternative discussion, that the no-project alternative would result in a much smaller scale of operations at the WCCSL, and a reliance on the IRRF, instead of the proposed WRC, for transfer and processing of West Contra Costa's waste. Since these are already permitted facilities that have been through CEQA review, there would be no additional impacts related to their future operation. Therefore, with the exception of the drainage problems that would be associated with not raising the height of the landfill to 160 feet, the no-project alternative would avoid or reduce all project-related impacts (assuming the Bay Trail would still be built). Because the no-project alternative would reduce or avoid nearly all project-related impacts, and still enable orderly and efficient processing and transfer of West Contra Costa's wastes, this should be evaluated as a potentially superior alternative.

8-2

8-3

#### **Comments on Other Alternatives**

The alternatives presented in the document do not constitute a "reasonable range" as required by the CEQA Guidelines (15126.6). Two of the alternatives, the alternative location for the WRC, and the alternative composting process, are not truly project alternatives, but merely minor variations on the same project. A third, the preferred environmental alternative, appears to be a combination of elements of the

8-4

other two alternatives, plus certain mitigation measures included in the impact analysis. It is not entirely clear from the discussion what the preferred environmental alternative consists of, how it compares to the project, and how it reduces project-related impacts.

8-5

In general, the analysis of impacts of each alternative, the ability of each alternative to meet project objectives, and comparison of alternatives with the project are uneven. There is no discernible reason that the Alternative Composting Process should receive such a thorough comparison (in Table 13-3), while the others do not. As suggested in the CEQA Guidelines (15126.6(d)), a matrix would be useful to summarize and compare characteristics and effects of the alternatives. This would provide the public and decision makers with a straightforward means of comparing the impacts and benefits of the alternatives and the proposed project.

8-6

## **Chapter 1 – Introduction**

No comments

## **Chapter 2 – Summary**

No comments

## **Chapter 3 – Project Description**

No comments

## **Chapter 4 – Land Use Plans and Policies**

Impact 4-2 examines the effects of discrete project impacts – noise, odor, public health, traffic and safety – on future users of the proposed Bay Trail, and finds that none of these would cause a significant impact. However, this impact should consider the essential incompatibility of the two types of land uses proposed by the project, large-scale resource recovery activities and recreational activities. The project proposes to put these in close proximity. While individual impacts – noise, odor, public health and safety – may fall below significance thresholds (and this is questionable; see especially comments on the Noise section), this does not diminish the fundamental incompatibility of uses in close proximity. Thus, while development of the trail is consistent with local plans and policies, development of the trail in conjunction with the proposed expanded and new operations at the closed landfill site is incompatible and in conflict with the established plan to develop the trail. Impact 4-2 should be identified as a significant impact, and appropriate mitigation measures developed. These might include minimum setbacks between trail segments and facility operations; reducing the scale of certain operations; and eliminating certain operations from the project. If the land use conflict cannot be resolved, the EIR should arrive at a conclusion that Impact 4-2 is significant and unavoidable.

8-7

An additional impact should be identified in the Land Use section regarding the potential impact of the WRC on diversion rates. While the project proposes to recover a portion of the materials processed at the WRC, the WRC's operator may decide to suspend recovery of those materials for purely economic reasons. This could result in a reduction in the diversion rate, which could have a significant impact on the ability of West Contra Costa communities to achieve the mandated 50 percent diversion rate. This would conflict with the adopted RIWMP and CIWMP, and would therefore be a significant impact. A mitigation measure should be identified that would require as a condition of the land use permit that the WRC recover for recycling a minimum portion of the waste received. This would ensure that there is no decrease in the diversion rate, and so would mitigate the impact to less-than-significant.

8-8

Impact 4-5 does an excellent job of analyzing the potential of the project to increase illegal dumping in the North Richmond area, and of discussing the environmental justice issues at stake. We also applaud

the identification of a host mitigation fee in Mitigation Measure 4-5. The Land Use section should, however, include a more general discussion of the environmental justice implications of the project, particularly related to the potential cumulative impacts of permitting and operating the proposed project, along with the already-permitted IRRF and the West Contra Costa Sanitary Landfill (WCCSL)

8-9A

For many years, the North Richmond community has been expecting the WCCSL to close and to be converted to a use or uses that would enhance the community, including recreational open space. Instead, the applicant is proposing to begin receiving and transferring wastes at a new WRC, and to expand greatly the capacity of the existing Bulk Materials Processing Center (BMPC). In addition, the IRRF could, under its existing permits, be built out so that it could handle its permitted capacity of 1,200 tons of waste per day. Furthermore, the landfill itself is not required to close until January 2006, and the Regional Water Quality Control Board's order to close the landfill could be rescinded or modified. It is therefore possible, under a "worst case scenario" that all of these facilities would be operating at capacity at the same time.

Table 1 compares the capacities of the permitted and proposed waste processing facilities in West Contra Costa County. As this table indicates, if the project is approved, there would be permitted capacity for processing an additional 1.32 million tons per year of waste. The majority of the increase (over 1 million tons) would come from the greatly-expanded BMPC. In all, there would be capacity for processing or disposing nearly 3 million tons of waste per year, or nearly 8,000 tons per day, seven days per week. According to the WCCIWMA's recent waste generation study, the five cities included in the West Contra Costa Regional Agency (not including unincorporated areas) generated 358,704 tons of waste (both disposed and diverted) in 2001. The unincorporated areas of West Contra Costa County likely generated about 10 percent of this amount, so that the entire region generated about 400,000 tons of waste in 2001. The capacity of the proposed WRC and the expanded BMPC alone exceed this amount by over 1 million tons per year. The permitted capacity of all facilities combined would exceed the waste generation of West Contra Costa County by over 2.4 million tons per year.

8-9B

The proposed expanded BMPC, the WRC, the IRRF, and the landfill could provide transfer, recovery, and disposal capacity for wastes from communities beyond West Contra Costa. Their combined capacity would create one of the largest waste processing, transfer, and disposal complexes in Northern California. North Richmond has for many years hosted far more than its share of polluting industries, could face many decades as the waste processing capital of the Bay Area. This constitutes an environmental injustice issue, and should be identified as a significant cumulative impact. The following mitigation measures should be included in the Final EIR:

A. The West Contra Costa Integrated Waste Management Authority (The Authority) currently has a contract (the IRRF Service Agreement) with West County Resource Recovery Inc. to use the IRRF for the transfer of Authority-controlled franchised waste from the Cities of El Cerrito, Hercules, Pinole, Richmond, San Pablo, and portions of Unincorporated West Contra Costa County. Aside from the IRRF Service Agreement, the Authority has a separate contract with WCCSL Inc. for handling self-hauled waste at a facility at the landfill site. These existing arrangements are consistent with the current County IWMP, and with the WCCIWMA Regional IWMP planning documents.

8-10

The Authority has been exploring with Republic Services the possibility of directing Authority-controlled franchised waste to the proposed WRC, instead of to the IRRF. At the time this letter is being submitted, there is no agreement of the parties for the Authority to use the proposed facility. The Authority's interests in the IRRF include the region's need for reliable waste transfer and processing, the \$17 million of the ratepayers' money that is being invested in the IRRF, and the predictable future rates for waste transfer and disposal that are spelled out in the IRRF Service Agreement (which expires in 2014). The

**Table 1**  
**Summary of Permitted and Proposed Solid Waste Facility Capacities in West Contra Costa County**

| <b>Facility</b>                                                                    | <b>Function</b>                   | <b>Permitted Capacity</b> | <b>Proposed Capacity</b> | <b>Difference</b> | <b>Basis</b>         |
|------------------------------------------------------------------------------------|-----------------------------------|---------------------------|--------------------------|-------------------|----------------------|
| <b>Bulk Materials Processing Center (Open-Air Processing at the Landfill)</b>      |                                   |                           |                          |                   |                      |
|                                                                                    | Composting                        | 10,000                    | 164,300                  | 154,300           | Tons per Year        |
|                                                                                    | Concrete and Asphalt Processing   | 125,000                   | 528,000                  | 403,000           | Tons per Year        |
|                                                                                    | Wet/Dusty Materials Processing    | -                         | 51,100                   | 51,100            | Tons per Year        |
|                                                                                    | Woodwaste Processing              | 30,000                    | 131,400                  | 101,400           | Tons per Year        |
|                                                                                    | Soil/Dredged Material Reclamation | -                         | 195,000                  | 195,000           | Tons per Year        |
|                                                                                    | Biosolids Spreading               | -                         | 50,000                   | 50,000            | Tons per Year        |
| <b>Subtotal: BMPC</b>                                                              |                                   | <b>165,000</b>            | <b>1,119,800</b>         | <b>954,800</b>    | <b>Tons per Year</b> |
| <b>Waste Recycling Center (New Transfer and Recovery Facility at the Landfill)</b> |                                   |                           |                          |                   |                      |
|                                                                                    | Transfer and Recovery             | -                         | 365,000                  | 365,000           | Tons per Year        |
| <b>Subtotal: BMPC plus WRC</b>                                                     | <b>See Above</b>                  | <b>165,000</b>            | <b>1,484,800</b>         | <b>1,319,800</b>  | <b>Tons per Year</b> |
| <b>Landfill</b>                                                                    |                                   |                           |                          |                   |                      |
|                                                                                    | Landfill, waste shuttle           | 912,500                   | 912,500                  | -                 | Tons per Year        |
| <b>IRRF</b>                                                                        |                                   |                           |                          |                   |                      |
|                                                                                    | Transfer and Recovery             | 438,000                   | 438,000                  | -                 | Tons per Year        |
| <b>TOTAL ALL FACILITIES (Tons per Year)</b>                                        | <b>ALL FUNCTIONS</b>              | <b>1,515,500</b>          | <b>2,835,300</b>         | <b>1,319,800</b>  | <b>Tons per Year</b> |
| <b>TOTAL ALL FACILITIES (Tons per Day)</b>                                         | <b>ALL FUNCTIONS</b>              | <b>4,152</b>              | <b>7,768</b>             | <b>3,616</b>      | <b>Tons per Day</b>  |

Authority would only agree to direct Authority-controlled franchised waste to the proposed WRC if these interests are adequately addressed. In addition, the Authority is aware of opposition within the North Richmond community to using the IRRF as a transfer station.

8-11

Accordingly, for economic, environmental, and environmental justice reasons, the EIR should recognize that the City of Richmond, Contra Costa County and the West Contra Costa Integrated Waste Management Authority each has a role in the orderly planning of appropriately sited waste transfer and processing facilities, and in the avoidance of development of excess waste capacity in the area. Specifically, each of these three public entities should take steps to ensure that there is only one permitted transfer station in the area. This can be accomplished through the following actions, which should be stated as mitigation measures in the Final EIR:

1. Assuming that the Authority and Republic Services reach agreeable terms for use of the proposed WRC for transfer of Authority-controlled franchised waste, the applicant should be required to apply to the County to amend their use permit for the IRRF to remove the allowance to use the site as a solid waste transfer facility. If an agreement to transfer Authority-controlled franchised waste at the proposed WRC transfer facility cannot be reached, then the IRRF would be used for transfer of Authority-controlled franchised waste, as per the existing IRRF Service Agreement, and the WRC, if developed, should be sized and permitted only to handle self-haul waste. An appropriate size for a self-haul only WRC would be 500 tons per day.

8-12

2. The Contra Costa County Board of Supervisors or the Richmond City Council (depending on whether the WRC is sited in the unincorporated area or within the City limits) shall include as a condition of approval for the WRC that the WRC may not receive waste for transfer until the West Contra Costa Sanitary Landfill is closed, with the possible exception of a limited transition period during which a small amount of waste would continue to be accepted in order to complete the landfill's final grades.

8-13

3. The County should consider adoption of the Reduced Project Alternative, described below.

8-14

B. As a condition of approval, an appropriate host community mitigation fee would be imposed on all waste arriving at the WRC and expanded BMPC.

8-15

## **Chapter 5 – Geology, Soils Seismicity**

No comments

## **Chapter 6 – Water Resources**

No comments

## **Chapter 7 – Aesthetics and Visual Quality**

No comments

## **Chapter 8 – Traffic and Circulation**

p.8-8, D1: The statement that “There are no neighboring developments that would be directly affected by the new traffic...” appears to ignore the possible future concurrent use of the IRRF. This statement should be revised to incorporate mention of the IRRF.

8-16

p.8-8, D2a: The statement that “peak activity...occurs during the spring and the fall” does not appear to be substantiated by the tables in Appendix 8A, on pages 14 – 16 of that Appendix. The basis for that statement should be made clear, and the discrepancy with the tables should be explained. 8-17

p.8-15, D3: In this discussion of roadway and intersection capacity, existing conditions are used as the baseline. If the baseline should be reasonably anticipated future conditions under existing permits, then the use of the IRRF for (at least) local franchise-collected wastes should be incorporated into the baseline, for impact analysis purposes. 8-18

Chapter 8: There is no discussion of potential impacts of project-related traffic on roadway congestion on I-580 or I-80. This should be addressed in the Final EIR. 8-19

p. 8-25, E2a: The DEIR states “it is assumed that the 1,050 TPD would be entirely new traffic on the regional roadway system.” However, the Project Description implies that when fully operational, the IRRF will receive local franchise-collected refuse and recyclables. This would not be new traffic; it is part of the very traffic that is used as the basis for describing the impacts of the proposed project. The DEIR should revise the aforementioned statement, and should quantify the extent to which refuse and recycling collection trucks that now unload at the WCCSL site would instead unload at the Central IRRF, as well as the extent to which the proposed project would be used by trucks that were not previously using the regional roadway system. This will identify the causes of increased traffic in the region and should enable the costs of any necessary mitigations to be assigned accordingly. 8-20

p. 8-26, 2nd paragraph: The discussion of ramp congestion does not clearly state whether the added congestion would exceed a significance criterion, but it does appear to consider this a possibility. This determination should be made more explicitly; and if a criterion is exceeded, a specific mitigation should be required of the proposed project, rather than assuming that the Central IRRF will manage its peak hour trucks. 8-21

## **Chapter 9 – Biological Resources**

No comments

## **Chapter 10 – Air Quality and Odor**

No comments

## **Chapter 11 – Health and Safety**

No comments

## **Chapter 12 – Noise**

No comments

## ***2. Broader Comments Relevant to the Larger West County Community***

### **Alternatives**

#### **Reduced Project Alternative**

A “Reduced Project” alternative that would examine a project with similar elements, but at a smaller scale, should be considered. This could include a modest increase in the capacity of the existing BMPC processing facilities. The current capacity of the BMPC’s functions (composting, wood waste processing, 8-22

concrete and asphalt processing is, according to the DEIR, 165,000 tons per year. The applicant proposes to expand existing functions and add new functions, resulting in an increase in annual capacity to 1.12 million tons per year, an increase of nearly 1 million tons (see Table 1). Under the Reduced Project Alternative, the capacity of the BMPC would be increased by a sufficient amount to meet the demands of West Contra Costa County, plus enough extra capacity to accommodate a modest amount of materials from outside the region. The total amount of the increase would be 55,000 tons per year, or one third of the existing capacity.

The Reduced Project Alternative could also eliminate those project elements that have a greater potential to harm the environment. This alternative would include a height increase for the landfill necessary to ensure adequate drainage.

## **Chapter 1 – Introduction**

No comments

## **Chapter 2 – Summary**

No comments

## **Chapter 3 – Project Description**

The figures in the project description are difficult to use. Lack of a scale bar on maps causes uncertainty about scale, especially when the maps are recopied. A scale bar should be added, and simpler hatching and text should be used to improve legibility. Where fine detail is called for, maps should be produced in 11x17 inch size.

8-23

Also, the figures are inconsistent in describing the location of dredged material and biosolids spreading areas. Or is it drying areas? The name of this area and its extent should be made consistent wherever it appears in the Section 3 figures. The comments below on the visual impacts section assume that Figure 3-7 shows all of the areas where these materials would be spread to dry.

8-24

Figure 3-5 is too general to provide an understanding of site circulation. It shows roadways but does not show the routes of travel of various types of vehicles. Also, it does not show how those routes would be affected by the alternate use of Area A for the WRC. It would be helpful to see how the general public will navigate through the site safely among other traffic streams. The routes of travel for the major traffic streams should be shown on a map of the site. A second map should show the routes of travel for the case when the WRC is located in Area A.

8-25

In addition to Table 3-1 and 3-3, the project description should include a table that clearly compares the current and proposed daily and annual permitted waste quantities for each project element. The project description should also provide information on the current and projected waste stream in West Contra Costa County, and the anticipated volume of waste that would be coming to the facility from outside of West County.

8-26

Page 3-23, first paragraph under Section 2g. Biosolids/Dredged Material Spreading, the 2nd sentence with the reference to Appendix 3G should be changed to Section 2f. Soil Reclamation.

8-27

## **Chapter 4 – Land Use Plans and Policies**

No comments.

## Chapter 5 – Geology, Soils Seismicity

Mitigation Measures 5-5 and 5-6 state that “additional geotechnical studies would be performed” to evaluate landfill stability and settlement at the location of proposed new or remodeled structures. Such future studies as mitigation measures are not consistent with CEQA Guidelines, since they could lead to deferral of the formulation of mitigation measures to a future time (Guidelines 15126.4(a)(1)(B)). These studies should be performed prior to CEQA review, so that the results may be considered in the EIR, and so that specific mitigation measures can be proposed, if necessary. Alternatively, as allowed in the same section of the Guidelines, performance standards may be specified in lieu of specific measures.

8-28

## Chapter 6 – Water Resources

No comments

## Chapter 7 – Aesthetics and Visual Quality

p.7-7, D1: The statement that “direct damage to scenic resources” is not a significance criterion should be substantiated. To the extent that the post-closure use of the landfill is currently designated as open space, it may be argued that the landfill itself will become a scenic resource after closure. Apparently the current permits anticipate some ongoing operations after closure, but this (or other rationale) should be stated. (CEQA guidelines 15128). Otherwise, the analysis should include the aesthetic effects of changing the post-closure use to ongoing waste recovery and processing operations.

8-29

p. 7-8, D2b: A view 1b is needed, using viewpoint 1 as the point of view but looking northwest (same bearing as viewpoint 2). This view 1b should be used to show the visual and aesthetic impact, if any, of biosolids and dredged material spreading and drying on the southern slopes of the closed landfill. These materials are likely to be dark in color and to strongly contrast with the appearance of other slopes on and off the project site. A pair of color photos similar to Figures 7-4 and 7-5 (but aimed northwest) should be used to simulate the appearance of the site with and without this spreading operation. If the effect on the scenic quality of this vista is substantially adverse, then a mitigation measure limiting the extent of this operation in this area should be considered.

8-30

p.7-10, D3: The statement that “users of the Trail are not considered to be sensitive receptors, as their presence would be elective and short term” appears to dismiss Trail users without considering that during their presence on the Trail, these users would have ¼ to ½ of their field of view occupied by the facility. The Trail was established to meet a local need (for outdoor experiences with, among other things, scenic vistas), and the proposed project appears to reduce the ability of the Trail to meet that need in the future. This discussion should acknowledge that the project site is part of the scenic resource to which the trail provides access, and that one function of the Trail is to provide a visually attractive setting for walking outdoors. Several of the operations should be more closely examined for their potential visual impact and these impacts minimized. For example, the double-stacked containers that will enclose the processing area for wet and dusty wastes should be painted a uniform color that blends well with the surroundings.

8-31

Also, Figure 7-5 should show, perhaps as a wire frame model, the silhouette of the WRC in its alternate location on Area A. A figure similar to 7-10 should be used in the same manner, so that the appearance of the WRC at Area A, and its contrast with its surroundings, can be fully understood.

8-32

## Chapter 8 – Traffic and Circulation

### General comment: Improper Baseline Used in Air Quality and Traffic Analyses

The DEIR uses an improper baseline for determining the significance of several impacts, and thereby understates the severity of impacts. This occurs most notably in the Air Quality and Traffic sections. In the Air Quality analysis (Chapter 10), Table 10-4 estimates “Existing Project-Generated Emissions” from

8-33



currently permitted activities at the WCCSL (presumably this refers to emissions from currently permitted operations, not from the “existing project” as the project is not yet approved). Future project-generated emissions are then estimated for the year 2008 (when the WRC is assumed to operate at 85% of capacity and other operations at 75% of capacity) and for 2015, when all operations are assumed to operate at 100% of capacity. These estimates are shown in Table 10-5 and Table 10-6. These tables compare future project emissions to those estimated for currently permitted operations, which apparently include landfill operations, and only the incremental difference is used to determine the significance of impacts. For example, Existing NOx emissions are given as 720.3 pounds per day in Table 10-4; then, in Table 10-5, Year 2008 project NOx emissions are given as 633.9 pounds per day, a decrease of 86.4 pounds per day. A similar approach is taken to the analysis of traffic impacts in Chapter 8 (see pages 8-8 through 8-13), which shows a relatively modest increase in traffic volume under project conditions in 2008 and 2015, compared to current operations.

The landfill is required by order of the Regional Water Quality Control Board to close on or before January 31, 2006. The project, including operation of the WRC, is expected to begin operation in 2005. The CEQA Guidelines require an EIR to describe the physical environmental conditions in the vicinity of the project, as they exist at the time of the notice of preparation, and that these will normally constitute the baseline physical conditions by which the significance of an impact is determined (CEQA Guidelines 15125(a)). However, in the case of this project, the closure of the landfill, which is clearly foreseeable at about the same time the project, if approved, would be implemented, will have a major bearing on the physical environmental conditions of the area. The approach taken in the document to the air quality and traffic analyses seriously underestimates the impacts of the proposed project, by “trading off” existing landfill emissions and traffic for future project emissions and traffic.

The EIR should therefore include an analysis of the following:

1. The incremental increase in emissions that will occur if the project becomes operational prior to closure of the landfill, in other words, an analysis of the significance of the impacts to air quality and traffic from the currently-permitted operation plus the proposed project. This would be a short-term impact, only until the landfill ceases accepting waste for disposal, but could still result in short-term significant impacts, most notably air quality impacts, over a period of several months;
2. Since the landfill is required to close no later than January 1, 2006, the comparisons in Table 10-5 and 10-6 should be only against those operations that are permitted to be operating at that time. In other words, the emissions and traffic related to landfill operations should be eliminated from the comparison, since the foreseeable future condition is that the landfill would close.
3. Alternatively, the analysis suggested in 2, above, could be presented against the analysis that currently appears in the document, to provide a comparison of current conditions against likely future conditions. However, the methods used, and the actual comparison being made, should be explicit in the document, in order to provide the public and the decision makers with needed information in assessing the actual impacts of the project.

#### **Other Comments on Chapter 8 – Traffic and Circulation**

p.8-7, D1: The basis for the statement that “There is adequate emergency access and parking that would be provided for the Public Access Trail” should be given. Appendix 3K states that a graveled parking area will be available but does not give its extent or the estimated number of spaces that would be available for trail users.

8-34

p.8-9, Table 8-4: In the rightmost column, the count of 620 daily vehicles at the existing WCCSL in the “all other vehicles” category, i.e. including employees, visitors and suppliers, is not credible and should be explained. Is there some other type of vehicle in this count? The footnotes should explain, and the relevance of that vehicle type to the proposed project should be made clear. 8-35

p.8-18, D3, Control Measures Incorporated by Applicant: The control measures should be described in greater detail, and it should be demonstrated that they will accomplish the intended degree of traffic management. The DEIR should explain if most of the vehicles coming to the proposed project are under the direct control of the applicant, for example, if they are operated by an affiliated company. If they are not, then how would these controls be applied? 8-36

p. 8-20, Mitigation Measure 8-3 (pavement monitoring): The adequacy of this mitigation measure alone is questionable, because it does not provide any assurance that the impact (damaged pavement) will be mitigated, and because it does not cite or set standards for pavement condition. The mitigation should enable the City or County to set such standards, based on commonly accepted standards such as MicroPAVER (ASTM D6433-99). Also, establishment of a Parr Blvd Repair Fund should be considered, to which the project would annually contribute 10% of the estimated cost to rebuild the intersection each year. The fund would be used when the required monitoring indicates the need. If the fund balance reaches 100%, contributions could be suspended until drawdown occurs. 8-37

p. 8-22, top (item (b)): Signage and striping alone may not provide sufficient safety for pedestrians, particularly from departing project customers, which are likely to drive at higher speeds than arriving customers. Pedestrian activated warning lights or flashing beacons should be added to the signage. The DEIR should indicate whether the City of Richmond or Contra Costa County has pedestrian crossing standards or guidelines that pertain to this situation. Sections 4K and 4L of the Manual of Uniform Traffic Control Devices describe some warning light options. 8-38

Appendix 8A, p.4: The table shows inbound and outbound traffic during the period November 2002 – January 2003. To provide a sound basis for the impact analysis, the Appendix should answer the following questions: Is this table representative of conditions throughout the year? If not, how has it been (or should it be) adjusted? Also, why are fewer daily average vehicles leaving than entering? Where did the 17 “missing” vehicles go? 8-39

Appendix 8A, p.6: The table shows a surprising amount of traffic between 6PM and 6AM. To provide a sound basis for the impact analysis, the Appendix should answer the following questions: Is that traffic unique to the sampling period or typical for the area? Has it been taken into account in the DEIR analyses? 8-40

Appendix 8A, p.16: The table shows an unusual surge in commercial traffic from August 12 through 15. To provide a sound basis for the impact analysis, the Appendix should answer the following questions: Was that a one-time event or does it occur annually? Was it incorporated into the analyses or “backed out”? 8-41

## **Chapter 9 – Biological Resources**

No comments

## **Chapter 10 – Air Quality and Odor**

Please refer to the “General Comment” under Traffic and Circulation, above.

Page 10-3, last paragraph. The 2<sup>nd</sup> and 3<sup>rd</sup> sentences should be modified as follows:

The closest monitoring station to the WCCSL is located in San Pablo (a few miles ~~east~~west of the WCCSL site). Table 10-3 summarizes air quality data from this monitoring site during the period ~~1999-2001~~2000-2002.

8-42

Page 10-6, 1<sup>st</sup> paragraph, last sentence. Delete the word “also” from the sentence.

8-43

Page 10-7, 4<sup>th</sup> paragraph, 2<sup>nd</sup> sentence, “BAAMD” should be corrected to “BAAQMD”.

8-44

Page 10-8, Section B.2.b. Odor. The BAAQMD is responsible for regulating odors at all areas of the landfill, with the exception of odors from the composting/co-composting operations. In accordance with AB 59, which became law in 1995, odors from composting operations are regulated by the California Integrated Waste Management Board (CIWMB) through the Local Enforcement Agency (LEA). Odors associated with other activities at the landfill (e.g., landfilling, green waste and wood waste processing, and sludge handling) are regulated by the BAAQMD. This clarification should be made either under this section or in a new section that discusses the LEA’s specific regulatory authority.

8-45

Page 10-12, Section D.2.a. Process Emissions. The DEIR does not include sufficient information to confirm the accuracy of the emissions estimates made for existing, 2008 and 2015 scenarios. Specifically, the DEIR discusses that existing emissions from equipment used in the concrete/asphalt recycling and composting operations were adjusted to reflect the proposed increase in annual throughputs for those operations. Also, the EIR states that emissions from soil reclamation, biosolids/dredged materials spreading, and wet dusty materials blending operations were calculated using the BAAQMD emission factors for soil handling. The information contained in Appendix 10A for these processes is presented in summary format with no detail. The only detailed emissions calculations included in Appendix 10A are those for off-road and on-road equipment operation.

8-46

Further, the DEIR emissions inventory should have included a more detailed discussion of emissions associated with composting operations. Recent studies and information produced by the South Coast Air Quality Management District (SCAQMD) and the CIWMB have focused on quantifying and measuring ROG emissions from composting/co-composting activities. These studies suggest that composting/co-composting activities may be a *significant* source of ROG emissions. In 2002, the SCAQMD published a draft Technology Assessment on various composting methods (including windrow composting of green/wood waste materials and biosolids co-composting) that establishes composite emission factors of 3.8 and 1.78 pounds of ROG per ton of green/wood material and mixed putrescibles (including food waste, and biosolids mixed with green/wood waste) composted by windrow method, respectively. These composite emission factors reflect total emissions during the active and curing phases of composting.

In an effort to measure the accuracy of the seemingly high ROG emission factor developed by SCAQMD for green waste composting facilities, the CIWMB has conducted independent source testing at the same green waste processing facilities where SCAQMD conducted source testing (the CIWMB did not, however, test emissions from co-composting operations). The results of the testing are summarized in two recently published Technical Summary Reports. Using a different air emissions test method than the SCAQMD, the CIWMB study found ROG emissions from green waste composting by windrow method to be roughly 27 percent of those measured by SCAQMD. As such, emissions from existing and proposed composting operation could be significant and could cause an exceedance of the BAAQMD’s 80 lbs/day criterion for ROG. The emissions inventories in Tables 10-4 through 10-6 should be re-worked to include composting emissions.

8-47

Lastly, the process emission calculations do not include fugitive landfill gas emissions that are not captured and treated. It is unreasonable to assume that the landfill gas collection system (LGCS) at the site is 100 percent effective in capturing landfill gas. Typical collection systems have a roughly 75 to 80 percent rate of capture. Similarly, the landfill gas combustion system is likely to be about 95 to 99 percent efficient in destroying landfill gas. Without the addition of fugitive landfill gas emissions and non-combusted emissions from the LGCS, the emissions estimates contained in Table 10-4 through 10-6 may substantially understate the amount of ROG emissions generated at the site and should be re-worked. 8-48

Page 10-13, Section B.2.c. On-Road Vehicle Exhaust. The emissions from on-road vehicle use should include re-entrained road dust on paved roads. The heading of this section should also be revised to read "On-Road Vehicle Emissions." The emissions inventories in Tables 10-4 through 10-6 should be re-worked to include an estimate of on-road re-entrained road dust emission using the BAAQMD-recommended 0.69 grams of PM-10 per vehicle mile traveled or other appropriate ARB or USEPA factor to estimate these emissions. 8-49

Also, it does not appear that the assumed trip lengths for future 2008 and 2015 scenarios are any different than those used for the existing scenario. It seems that at a minimum the length of transfer trailer trips that will be transferring refuse once the LF is closed to Potrero Hills LF would increase significantly, and would be well above the trip lengths assumed in this air quality analysis. As such, ROG, NOx and PM-10 emissions could be substantially higher in 2008 and 2015 than shown in Table 10-5 and 10-6, respectively. The emissions inventories in Tables 10-5 and 10-6 should be re-worked to include the expected increase in VMT in future years. 8-50

Page 10-17, 3<sup>rd</sup> paragraph, 2<sup>nd</sup> sentence should be modified as follows: 8-51  
"Two separate model runs were constructed."

Page 10-24, Impact 10-4. Based on the above-described comments regarding the accuracy of the emissions estimates conducted for this EIR, it is possible that the project could result in exceedances of the BAAQMD's 80 lbs/day threshold for ROG and NOx. Because the DEIR analysis does not include quantification of composting emissions, fugitive landfill gas, and the net increase in VMT, it is assumed that the actual emissions at the site may exceed the emissions that have been accounted for in the most recent emissions inventory that serves as the basis for air quality planning in the region. As such, the project could impede the region's ability to reach attainment for ozone. 8-52

Impact 10-9, 2<sup>nd</sup> paragraph. There is no Section A5 in the Air Quality and Odor section. Please correct cross-reference. 8-53

Page 10-34, Cumulative Impacts. Based on the above-described comments regarding the accuracy of the emissions estimates conducted for this DEIR, it is possible that the project could result in exceedances of the 80 lbs/day thresholds for ROG and NOx. As such, the project could also result in significant and unavoidable cumulative impacts for ROG and NOx. 8-54

## **Chapter 11 – Health and Safety**

Page 11-7, 2<sup>nd</sup> paragraph, 3<sup>rd</sup> sentence, "WCSL" should be corrected to "WCCSL". 8-55

Page 11-18, D.1 Impacts Considered not to be Significant. The following significance criteria should be added to the list: 8-56

“Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized area or where residences are intermixed with wildlands.”

Impact 11-6 (page 11-27), 1<sup>st</sup> paragraph. The following sentence is repeated twice in the paragraph:

8-57

“Both outdoor and indoor air in the natural environment contain all of the microorganisms, in variable amounts, that are associated with composting.” Delete one of the two sentences.

## Chapter 12 – Noise

Page 12-3, 2<sup>nd</sup> paragraph. This paragraph should be modified to clarify that stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate at a rate of 6 to 7.5 dBA per doubling of distance from the source, depending on environmental conditions (i.e., atmospheric conditions and noise barriers, either vegetative or manufactured, etc.). Widely distributed noise, such as a large industrial facility spread over many acres or a street with moving vehicles, would typically attenuate at a lower rate, approximately 3 to 4.5 dBA.

8-58

Pages 12-5, Section A.2. Existing Conditions. It would be helpful to the reader if short- and long-term measurement data were summarized in a table and the locations where measurements were taken shown on a corresponding figure. The figure should also show the location of the project site and noise measurement locations relative to nearby noise-sensitive receptors. Also, more detail on those measurements that were collected such as duration, time of day, and day of week would have made the data more meaningful. Further, the EIR does not include detailed noise measurement data in the Appendices. A brief table showing the hourly Leqs measured over a 24-hour period would have been meaningful information to provide.

8-59

Page 12-7, Section B.2, Local, 1<sup>st</sup> paragraph. This section should describe whether or not the County also has a noise ordinance that would apply to the project.

8-60

Page 12-9, Section C. Significance Criteria, last paragraph. The last sentence does not express a time period or noise descriptor for the 3 dB increase in noise. That would suggest that a 3 dBA increase in an hourly Leq or DNL noise level would be significant. A distinction here is important; particularly during nighttime hours when expanded facility hours could have an adverse effect on noise levels at sensitive receptor locations along haul routes and closest to the project site.

8-61

Also, nowhere in the noise section is it acknowledged that the noise environment at residential locations along haul routes providing access to and from the site are well above the City- and County-recommended 60 DNL standard for residential uses.

8-62

Impact 12-4 and Section E. Cumulative Impacts. It is unclear how it was determined that noise from increased truck activity during nighttime hours would be less than significant. Detailed model outputs were not included in the EIR – it is impossible to determine whether modeling assumptions and conclusions are accurate. Modeling should take into account the use of large transfer trailers in the future.

8-63

END OF COMMENTS

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**LETTER  
#8  
RESPONSE**

West Contra Costa Integrated Waste Management Authority  
Steve Devine, Executive Director  
December 22, 2003

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- 8-1. This comment suggests that the no-Project alternative analysis should discuss the results of Project non-approval by clearly showing the reductions in air emissions and traffic that would result when the landfill closes. The analysis of the no-Project alternative in Chapter 13, Section B is considered sufficient and adequate relative to compliance with CEQA and its purpose of informing the public and decision-makers of the consequences of Project approval and non-approval. Both the air quality and traffic implications are discussed in Section B. The no-Project analysis properly discusses existing conditions at the time the Notice of Preparation was published as well as what would be reasonably expected to occur in the future if the Project were not approved (CEQA Guidelines 15126.6(e)(2)).

For additional information on air quality, the commenter is referred to response to comment 8-49 which provides additional information. The air quality database properly considered emissions of existing landfill operations in developing Table 10-4. If landfill operation were excluded from Table 10-4, process emissions would remain the same, mobile equipment/vehicle exhaust emissions would decrease by a sizeable percentage, and fugitive emissions would decrease by a small percentage. Off-site road vehicle exhaust emissions would also decrease as municipal solid waste would be directed to an expanded Central Integrated Resources Recovery Facility (IRRF). For traffic, the commenter is referred to Table 8-4 of the Draft EIR. If landfill operations were excluded from this table, the 2,250 vehicles per day would be reduced by 1,600 to 1,700 vehicles per day. Many of these vehicles would be redirected to an expanded Central IRRF.

- 8-2. This comment suggests that the no-Project analysis does not contain an analysis that the proposed increase in resource recovery capacity associated with the Project is needed. It is the goal of the Applicant to maximize resource recovery and recycling opportunities consistent with the requirements or goals of the California Integrated Waste Management Act or Board. There is no requirement that the service area of the West Contra Costa Sanitary Landfill (WCCSL) has to be restricted to a certain geographical area. The intent of the Project proposal is to achieve the economy of scale offered by regional operations. The processing of only West County waste materials could adversely affect the economics of the required waste diversion activities. The location of the WCCSL served by existing freeways and adjacent to arterial roadways, allows the delivery of processible materials from other communities without significant regional or local transportation impacts. The area available at the site provides the opportunity to operate the facility at a regional scale. By combining the management and operation of a number of bulk material processing functions, the economies of scale can be realized. It should be noted that existing West Contra Costa Integrated Waste Management Authority/West County

Landfill, Inc. (Authority/WCL) contractual obligations preclude use of the IRRF Central Processing Facility as a processing center for the non-franchised wastes.

- 8-3. This comment suggests the no-Project alternative should be evaluated as a potentially superior alternative. Sections B2 and B3 in Chapter 13 of the Draft EIR provide discussions on the environmental considerations of the no-Project alternative and comparison to the proposed Project. Based on that discussion, there is no basis for considering the no-Project alternative as the environmentally superior alternative as it would not meet the Applicant's stated objectives, would not provide for more effective drainage management at the landfill, and a large increase in resource recovery processing capacity would not occur. The commenter is also referred to other comment letters in this Responses to Comments Document in which concerns are expressed about the impacts that an expanded Central IRRF would have on the North Richmond community and, thus, favor the proposed Project. Comment letters include The Beautification Committee of North Richmond (Letter 9), the Richmond Chamber of Commerce (Letter 10), and the West County Toxics Coalition (Letter 15).
- 8-4. This comment suggests the alternatives presented in Chapter 13 of the Draft EIR do not constitute a "reasonable range" consistent with CEQA Guidelines §15126.6(f). It is the position of the County Community Development Department, as Lead Agency, and the EIR consultant that a reasonable range of alternatives has been considered. In addition to the no-Project alternative, alternatives were considered that substantially meet the Applicant's Project objectives while addressing identified issues associated with the Project as proposed. The alternative Area A for location for the Waste Recycling Center has some practical advantages over the former Soil Remediation Building location and avoids the settlement issues associated with that site. Aerated static pile (ASP) also offers advantages over the open windrow composting process given the types of feedstocks proposed, and would have less impact on the environment. Thus, the Preferred Environmental Alternative includes the Project with mitigation measures, the alternative Area A location for the WRC, and the ASP composting process.
- 8-5. This comment suggests that the discussion in Section E of Chapter 13 of the Draft EIR is not clear in what the Preferred Environmental Alternative (PEA) consists of and how it reduces Project-related impacts. A summary of the PEA is included in Table 13-4 of the Draft EIR which lists the main characteristics of each PEA component. Because the PEA includes EIR mitigation measures, the bulk of the EIR is devoted to how Project impacts would be reduced. Additional analyses of ASP and the alternative WRC site at Area A in Chapter 13 of the Draft EIR describe how these components of the PEA reduce Project-related impacts.
- 8-6. This comment suggests the analysis of alternatives is uneven. The discussion and analysis of alternatives in Chapter 13 of the Draft EIR were structured to meet the requirements of CEQA and the Lead Agency. An appropriate level of analysis and comparison was provided. Owing to the magnitude and complexity of the ASP composting process and alternative WRC site as Project alternatives, matrices were provided as Tables 13-2 and 13-3.

- 8-7. This comment suggests that development of the Trail in conjunction with other components of the Project is incompatible. The results of the analysis in the EIR do not concur with this opinion. This comment should be placed in the perspective that the proposed Trail is not a part of the San Francisco Bay Trail, and thus has a lesser public policy purpose. It is a spur trail specified in the North Richmond Shoreline Specific Plan that would accomplish the goal of providing public access along the landfill shoreline of the Bay, if it is feasible to develop and operate a trail at this location on this private property.

The co-location of the WRC at the Area A location and the adjacent Trail would not create any significant environmental impacts. The existing Central IRRF industrial processing operation has been adjacent to the Wildcat Creek Public Access Trail since its inception 9 years ago. Along the south property line of the Central IRRF a soil berm was erected, and a fence was placed on top of the berm next to the trail and across the creek from houses located about 300 feet away. Design of the WRC Area A site will involve a similar soil berm placed along two sides of Area A facing the Trail. The soil berm would be about 8 feet high and thus would provide a noise barrier and visual screen to persons walking on the Trail. The security fence placed near the top of the berm will be covered with vegetation, or visibility-screening material will be attached, thus providing additional height of the screening.

- 8-8. This comment contends that an additional land use impact should be included in the EIR to account for a reduced diversion rate if the Applicant elects to suspend recovery of materials at the WRC. Suspension of material recovery at the WRC is not proposed by the Applicant as part of the Project. The Applicant's potential future business management decisions are speculative and not normally the subject of an EIR; however, they may be appropriate for consideration in business agreements between the Applicant/WRC operator and its customers, and/or as conditions of approval in future use permits.
- 8-9A. This comment suggests the Draft EIR should include a more general discussion of the environmental justice implications of the Project, particularly related to potential cumulative impacts. The analysis of the environmental justice implications of the Project in Impact 4-5 of the Draft EIR is appropriate and adequate. The discussion of cumulative impacts in the Draft EIR did address the Project and the concurrent operation of an expanded Central IRRF, though it is considered unlikely that the two projects would be operating concurrently, at full design capacity.

The Applicant is aware of the fact that if the WRC is permitted at the WCCSL site, both the IRRF and the WRC would have the capacity and permits authorizing the transfer of solid waste for disposal. If the EIR is certified and the WRC is permitted and built, there would not be a need to have two fully permitted solid waste transfer facilities to haul waste for landfill disposal. The Applicant has agreed to the following supplemental provision:



“The Applicant agrees that in the event the WRC is permitted and built to provide transfer capacity of at least 1,000 tons per day, the Applicant will agree to amend its permits to relinquish the authority provided by the County Land Use Permit (LUP) No. 2053-92 for the IRRF and the IRRF Solid Waste Facilities Permit to transfer solid waste disposal at the IRRF, unless the West Contra Costa Integrated Waste Management Authority directs the Applicant to transfer JPA solid waste for disposal utilizing the IRRF facility. Nothing herein shall preclude nor be construed to preclude or otherwise limit the continued use of the IRRF as a recycling center for the management, handling and transfer of recyclable materials.”

- 8-9B. This comment questions the capacities of the proposed Project conclusions in this letter based on Table 1 does not appear to be realistic for a worst-case scenario as not all activities would occur simultaneously. For the Central IRRF to handle 1,200 TPD, a new building addition would be required to jointly handle that tonnage while continuing to process recyclables. The design, construction and commencement of operation of an expanded building before the end of 2005 is not realistic due to the time required to design the expansion, obtain approvals, and complete construction, especially in light of the opposition being raised by North Richmond residents against any waste transfer operations at the Central IRRF. Thus, utilizing the 1,200 TPD permitted capacity is not practical during the remaining operation of the landfill. According to the Applicant, the commencement of operation of the WRC at the landfill is expected to occur in mid or late 2005, timed to sequence with the landfill closing process. Thus, the 1,000 TPD capacity of the WRC includes approximately 800 TPD of wastes now going to the landfill. Furthermore, based on available information regarding waste streams in the short term, it does not appear likely that the landfill would begin handling waste at its existing 2,500 TPD daily limit. Additionally, processing this volume is not practical since a very limited area remains available to handle the daily truck unloading and to place the wastes. Following this full landfill disposal scenario, then the landfill would be filled in one-third the remaining time (i.e., if the 2,500 TPD deliveries began in March 2004 and 24 months of maximum site life remained, then the landfill would be filled in 8 months or by November 2004). It is difficult to believe that the Applicant would elect to receive wastes at such a rate if the WRC transfer operations will not be available until mid-2005 at the earliest. Thus, the total permitted capacity of all the facilities proposed in the West County area is not realistic because they will not all be operational at the same point in time. The proposed Project with a combined total annual tonnage of 1,484,800 tons per year (4,068 TPD) appears to be a reasonable maximum project size, especially since it includes a projected increase of business above currently available amounts of wastes.

- 8-10. This comment suggests certain measures as “mitigation” for what have been described in the comment as socio-economic issues related to the Project. The preparers of the EIR do not agree that such issues would or should be considered significant impacts of the Project. The EIR and the materials comprising the administrative record do not support this conclusion. To the contrary, the administrative record indicates that the North Richmond community, located easterly of the Richmond Parkway, has stated its support for the Project in written communications to the Lead Agency commenting on the EIR (see comment letters 9, 10, and 15). In addition, pursuant to the provisions of CEQA, perceived or actual economic or social effects of a project shall not be treated as a significant effect on the environment. See, e.g., CEQA Guidelines, 14 CCR 15131.

The commenter’s proposed mitigation measure on pages 4 and 5 of the comment letter are premised on the existence of an economic proposal which has been discussed between the Authority and Republic Services, Inc. (Applicant) relative to a proposal by which the solid waste under the regulatory authority of the Authority could be transferred through the Applicant’s proposed transfer facility that is part of the Project. The commenter notes that at the time of writing of the comment letter negotiations were taking place regarding such a proposal. The economics of such a proposal are not part of the Project, the subject of this EIR. The proposed Project includes resource recovery operations at the WCCSL, and also a solid waste transfer station at the landfill site. The transfer station may, according to the Applicant, accommodate the Authority wastes as new business on a contractual basis. These wastes are currently disposed of in the West County landfill facility. The transfer station element of the Project, however, is not premised upon or dependent upon the transfer of Authority wastes through this facility. Therefore, the contractual negotiations of the parties are not relevant in any way to the adequacy of the EIR. As noted above, economic issues and effects associated with a project are not significant effects on the environment pursuant to CEQA. Thus, no mitigation is warranted or appropriate pursuant to CEQA. Moreover, as stated by the California Supreme Court in the leading case of *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, CEQA’s rules regarding protection of the environment must not be used as an instrument for the delay of social, economic, or recreational development and advancement. The matter of a contract and the negotiation of its terms is a matter properly left to the negotiating parties, and is not properly the subject of this EIR or any mitigation measures associated with significant impacts of the Project identified in the EIR.

- 8-11. This comment notes that the Authority is aware of opposition within the North Richmond community to using the IRRF as a transfer station. No response is required.
- 8-12. This comment suggests a specific requirement or measure as a condition of approval for the Project, but this is not a mitigation measure pursuant to CEQA. The measure is premised on the outcome of negotiations between the Authority and the Applicant. See response to comment 8-10. The Authority, however, can require the Applicant to apply for an amendment to the County’s LUP as a condition of contract negotiations. The current permit holder at the Central IRRF has vested rights for the property as defined by the LUP.

- 8-13. This comment suggests a specific requirement or measure as a condition of approval for the Project, but this is not necessary to mitigate any potential significant effect of the Project and, therefore, is not a mitigation measure pursuant to CEQA. See response to comment 8-10.
- 8-14. This comment suggests the County should adopt a Reduced Project Alternative. As discussed in response to comment 8-22, it is the position of the EIR consultant and the County Community Development Department as Lead Agency that a reasonable range of alternatives has been included in the Draft EIR and that further consideration of additional alternatives is not necessary. See response to comments 8-2, 8-4, and 8-9B.
- 8-15. This comment suggests an appropriate host mitigation fee be imposed as a condition of approval. Please see response to comment 17-14 for a discussion of this issue.
- 8-16. This comment suggests that the statement of page 8-8 of Section D1 of the Draft EIR should mention the possible future concurrent use of the IRRF. The discussion in Section D1 is accurate in the context of the proposed Project and the assumption in the assessment of Project-related impacts that the Central IRRF is not expanded. The assessment of potential cumulative impacts is included on page 8-23 of the Draft EIR.
- 8-17. This comment suggests that the discussion on page 8-8, Section D2(a) of the Draft EIR is not substantiated by Appendix 8A. The statement that "...peak activity occurs in the spring and fall" is an accurate portrayal of WCCSL activity. With the exception of one 4-day period (Appendix 8A – August 12-15), the period in late May is the highest continuous set of daily vehicles counts.

The basis for the peak activity reference in the Draft EIR comes from anecdotal information from the landfill operator and monthly data from the entry station that goes back several years. For example, based on the RDSI, the day with the highest peak tonnage in 2000 was on September 12. In 2001, the day of peak tonnage was on October 16. According to the Applicant, in 2002 the peak day was on November 29, and in 2003 the peak day was on April 7. Thus, past and reasonably current data supports the statement regarding peak activity periods at the WCCSL.

Generally, the winter months from December through March have the lowest level of activity. During the rest of the year, the monthly level of activity is fairly consistent. There are short-term periods that can occur during any of these remaining months when, due to weather factors and holidays, the amount of activity will increase dramatically. The peak activity generally occurs in the spring and fall.

- 8-18. This comment suggests the discussion of roadway and intersection capacity on page 8-15, Section D3 of the Draft EIR should include consideration of an expanded Central IRRF. The baseline for the analysis of traffic impacts is 2003, or about the time the Notice of Preparation process was completed (CEQA Guidelines Section 15125(a)). This approach is also consistent with County standards for the conduct of traffic impact studies. The

expanded Central IRRF is considered in the discussion of cumulative impacts in Chapter 8, Section E. Also, see response to comment 8-33.

- 8-19. This comment suggests there should be a discussion of impacts of Project-related traffic on I-580/I-80 roadway congestion. As discussed in Chapter 8 of the Draft EIR, the Project itself does not generate enough traffic to affect traffic conditions on I-580 or I-80. There would be no measurable change in traffic characteristics that could be determined. Therefore, the Project will not result in significant impacts to I-580/I-80.
- 8-20. This comment suggests the Draft EIR should reevaluate that the 1,050 TPD to the expanded Central IRRF would be entirely new traffic. The commenter is correct to note that the Project Description does indicate the Central IRRF would receive the West County franchised wastes (subject to decision of the Authority). However, it is also noted in the Project Description that the franchised waste could be processed at the proposed WRC and reduce the capacity available for the new business component within the facility's proposed design capacity. The assumption in the cumulative traffic analysis, as stated on page 8-25 of the Draft EIR, is that the additional 1,050 TPD necessary for the Central IRRF to reach its design capacity of 1,200 TPD would be entirely new traffic on the roadway system. This is a reasonable assumption. The cumulative analysis in Chapter 8 of the Draft EIR, where both the Central IRRF and WRC are operating at full capacities, did not reveal any impacts that could not be mitigated. The point regarding cost is moot, since no mitigations were identified in this EIR for the Central IRRF as it is not a part of this Project. The Central IRRF was previously evaluated and mitigation measures were implemented in the EIR prepared for that project in 1991.
- 8-21. This comment suggests the discussion of ramp congestion on page 8-26 of the Draft EIR does not clearly state whether the added traffic would exceed a significance criterion. There are no explicit, reliable standards of significance for evaluating freeway ramp congestion owing to the numerous variables involved in such a setting. Under cumulative conditions, and conservative assumptions, further congestion of the I-80 ramps would be expected during the AM and PM peak hours. It would be reasonable to expect that the Central IRRF would manage its peak-hour trips, as would the Applicant for the proposed Project.
- 8-22. This comment suggests a reduced Project alternative should be evaluated. The conclusion of total capacity as presented in this letter is based on Table 1. Table 1 is flawed as not all operations would occur simultaneously. It is the position of the EIR consultant and the County Community Development Department as Lead Agency that a reasonable range of alternatives has been included in the Draft EIR and that further consideration of additional alternatives is not necessary. See response to comments 8-2, 8-4, and 8-9B. To arbitrarily assume one-third of existing operation as a basis for a reduced Project alternative would not meet Project objectives such as public self-haul.
- 8-23. This comment expresses an opinion on graphics included in Chapter 3 of the Draft EIR. The figures are adequate. No response is required.

- 8-24. This comment suggests edits to Chapter 3 figures of the Draft EIR. Chapter 4 of this Response Document contains modified and new figures resulting from comment letters on the Draft EIR.
- 8-25. This comment correctly notes that Figure 3-5 from the Draft EIR does not show travel routes. A modified Figure 3-5 is included in Chapter 4 of this Responses to Comments Document and a new Figure 3-5 shows the proposed WRC site access and circulation plan. Additionally, a revised Figure 13-2 is also included in Chapter 4 showing traffic flow for the alternative Area A location.
- 8-26. This comment suggests Chapter 3 of the Draft EIR contain a table that compares the current and proposed waste quantities for each Project element, as well as the waste stream from other sources. Table 3-1 of the Draft EIR compares the existing and proposed permitted quantities, as well as locations of Project facilities. Table 3-3 shows both average and peak proposed quantities. These tables are considered to be sufficient for use in the Draft EIR. Also, see response to comment 2-2.
- 8-27. This comment suggests an edit to page 3-23. No change is required.
- 8-28. This comment suggests that either geotechnical studies should be performed now or performance standards be specified. The commenter states that mitigation measures 5-5 and 5-6 are not consistent with CEQA Guidelines since they could, in the opinion of the commenter, lead to deferral of the formulation of mitigation measures. The commenter also suggests that performance standards may be used in lieu of specific mitigation measures. The preparers of the EIR do not agree that any such mitigation has been deferred for the reasons set forth below.

The regulation of solid waste landfills is comprehensive, including federal Subtitle D regulations incorporated into the State's regulatory program, as well as specific state law requirements embodied in statutes and Title 27 of the California Code of Regulations ("CCR"). The regulatory framework is set forth at pp. 5-11 through 5-14 of the Draft EIR. The mitigation measures identified, 5-5 and 5-6, are both premised on the application of prescriptive and performance standards set forth in 27 CCR sections 20240(d) and 27150 regarding foundations for engineered structures and geology and seismicity standards applicable to waste disposal units.

For landfill waste management units, 27 CCR section 20240(d) provides:

*"(d) **Unit Foundation** — All engineered structures (including, but not limited to, containment structures) constituting any portion of a Unit shall have a foundation or base capable of providing support for the structures, and capable of withstanding hydraulic pressure gradients to prevent failure due to settlement, compression, or uplift and all effects of ground motions resulting from at least the maximum probable earthquake [for Class III Units (see section 20370)] or the maximum credible earthquake [for Class II Units (see section 20370)], as*

*certified by a registered civil engineer or certified engineering geologist. [Note: see also section 21750(f)(5).]*”

Section 21750(f) provides the following detailed prescriptive and performance standards for geology and seismicity. Section 21750(f)(5) was summarized on p. 5-12 of the Draft EIR.

**“(f) Geology.**

*(1) **Map and Cross-Sections** — A comprehensive geologic map and geologic cross sections of the Unit showing lithology and structural features. Cross sections shall be indexed to the geologic map and shall be located to best portray geologic features relevant to discharge operations.*

*(2) **Materials** — A description of natural geologic materials in and underlying the location of both the Unit and its surroundings, including identification of each rock's type, relative age, distribution and dimension features, physical characteristics, special physical or chemical features (e.g., alteration other than weathering), distribution, the extent of any weathered zones, susceptibility to natural surface/near-surface processes, and all other pertinent lithologic data, all in accordance with current industry-wide practice [e.g., California Division of Mines and Geology's (CDMG's) Note 44 "Guidelines for Preparing Engineering Geologic Reports" (April, 1986)].*

*(3) **Geologic Structure** — A description of the natural geologic structure of materials underlying the location of the Unit and its surroundings, including: the attitude of bedding (if any); thickness of beds (if any); the location, attitude, and condition (tight, open, clay- or gypsum-filled, etc.) of any fractures; the nature, type (anticlinal, synclinal, etc.) and orientation of any folds; the location (surface and subsurface), age, type of surface displacement, attitude, and nature [e.g., aperture, amount of brecciation, degree of alteration and type of alteration products (tight, gouge-filled, etc.)] of any faults; and all other pertinent, related structural data, (all of the foregoing) in accordance with current industry-wide practices [e.g., CDMG's Note 42 "Guidelines to Geologic/Seismic Reports" (May, 1986), and CDMG Note 49 "Guidelines for Evaluating the Hazard of Surface Fault Rupture" (May, 1986)].*

*(4) **Engineering and Chemical Properties** — The results of a testing and estimation program, carried out by a registered civil engineer or certified engineering geologist, as needed to formulate and support detailed site design criteria, including:*

*(A) Determination of engineering and chemical properties of geologic materials underlying and surrounding the Unit, and of the*

*Unit's containment structure components (i.e., liner, LCRS, and final cover components);*

*(B) Determination, or estimation, of the engineering and chemical properties of the waste and other layers placed, or to be placed, within the Unit.*

*(5) **Stability Analysis** — A stability analysis, including a determination of the expected peak ground acceleration at the Unit associated with the maximum credible earthquake (for Class II waste management units) or the maximum probable earthquake (for Class III landfills). This stability analysis shall be included as part of the ROWD (or JTD) for the proposed Unit, and an updated stability analysis (if the original analysis no longer reflects the conditions at the Unit) shall be included as part of the final closure and post-closure maintenance plan. The methodology used in the stability analysis shall consider regional and local seismic conditions and faulting. Data and procedures shall be consistent with current practice and shall be based on an identified procedure or publication. The stability analyses shall include modifications to allow for site specific surface and subsurface conditions. The peak ground acceleration so determined shall be the stability and factors of safety for all embankments, cut slopes, and associated landfills during the design life of the unit. For landfills and for waste piles and surface impoundments closed as landfills, final cover slopes shall be designed in compliance with the slope requirements of section 21090.*

*(A) The stability analysis shall ensure the integrity of the Unit, including its foundation, final slopes, and containment systems under both static and dynamic conditions throughout the Unit's life, closure period, and post-closure maintenance period. The stability analysis shall include:*

- 1. The method used to calculate the factors of safety (e.g., Bishop's modified method of slices, Fellinius circle method, etc.);*
- 2. The name of any computer program used to determine the factors of safety; and*
- 3. A description of the various assumptions used in the stability analyses (height of fill, slope and bench configuration, etc.).*

*(B) The stability analysis shall address all portions of the Unit and its immediate surroundings that are located in areas subject to liquefaction or unstable areas with poor foundation conditions, as*

*identified either in the ROWD or in the Seismic Safety Element of the County General Plan, and shall address all portions of the Unit that incorporate geomembranes as part of the Unit foundation or containment system (including the final cover).*

*(C) The stability analysis shall be prepared by a registered civil engineer or certified engineering geologist. Except as otherwise provided in (f)(5)(D), the report must indicate a factor of safety for the critical slope of at least 1.5 under dynamic conditions. Regardless of the analysis method used, the stability analysis report shall include at least the following elements:*

*1. Report preparation shall be in accordance with CDMG Note Number 42, "Guidelines for Geologic/Seismic Reports," May 1986, and CDMG Note Number 44, "Guidelines for Preparing Engineering Geologic Reports," April 1986, [both available from the California Division of Mines and Geology (CDMG), 801 K Street, MS14-34, Sacramento, CA 95814-3532, phone 916-445-5716] which are both incorporated by reference, and shall include the following seismicity elements:*

- a. A review of earthquakes during historic times;*
- b. Location of active major faults; and*
- c. Surface investigation of the site and surrounding area;*

*2. The location of the critical slope and other slopes analyzed to determine the critical slope shall be shown in map view;*

*3. Calculations used to determine the critical slope;*

*4. A profile of the critical slope geometry showing the various layers including the proposed fill surface, final cover, mitigation berms, lifts or cells of waste, fluid levels, or any feature that may serve to reduce the stability of the slope or may represent a potential failure surface; and the proposed ground surface, soil or rock layers and structural features;*

*5. The engineering properties of the refuse and other layers making up the site, shall be analyzed when determining the critical slope. These properties shall include a site specific*



*assessment of the strength parameters, the unit weight and, if using (f)(5)(D), the shear wave velocity of each of these layers;*

*6. An assessment of the engineering properties of the underlying foundation materials under both static and dynamic conditions based on field and laboratory tests as determined necessary by a registered civil engineer or certified engineering geologist;*

*7. The maximum expected horizontal acceleration in rock at the site determined for the design earthquake for the Unit under section 20370 [i.e., for Class II Units, the maximum credible earthquake (MCE), and for Class III Units, at least the maximum probable earthquake (MPE)], as supported by data and analysis. For Class III landfills, the maximum expected acceleration in rock from the MCE can be used instead of the MPE;*

*8. Seismic shaking parameters other than acceleration shall also be included in any assessment of dynamic slope stability. These parameters shall include at least earthquake magnitude and duration;*

*9. Documentation of any peer reviewed reduction factor for acceleration applied to attenuate the acceleration through the soil column or fill materials; and*

*10. Documentation, as part of the dynamic stability determination, of any peer reviewed amplification factor used for acceleration in loose saturated soils, if the Unit is located in an area subject to liquefaction, poor foundation conditions, or seismic amplification.*

*(D) In lieu of achieving a factor of safety of 1.5 under dynamic conditions, pursuant to (f)(5)(C), the discharger can utilize a more rigorous analytical method that provides a quantified estimate of the magnitude of movement. In this case, the report shall demonstrate that this amount of movement can be accommodated without jeopardizing the integrity of the Unit's foundation or the structures which control leachate, surface drainage, erosion, or gas.*

Mitigation Measure 5-5, relative to potential settlement of the landfill under existing and future fill loads, implements the above-described regulatory requirements, requiring the appropriate supplemental technical analysis and reports to meet the requirements of

sections 20240(d) and 21750(f)(5). There is no deferral of implementation of any potential additional mitigation, since the Lead Agency's requirement that the Applicant adhere to the applicable prescriptive and performance requirements of these regulatory requirements constitutes mitigation of the potential impact identified. The same is true for Mitigation Measure 5-6 relative to supplemental geotechnical study for compliance with the specific requirements of section 20240(d) and 21750 (f)(5). As with Measure 5-5, there is no deferral of implementation of any potential additional mitigation, since the Lead Agency's requirement that the Applicant prepare supplemental reports in compliance with section 20240(d) and 21750(f)(5) constitutes mitigation of the potential impact identified. In any event, the commenter concedes that pursuant to CEQA and the Guidelines, performance standards may be used in lieu of specific mitigation measures. Mitigation Measures 5-5 and 5-6 apply these standards as required and authorized by law.

- 8-29. This comment suggests that "direct damage to scenic resources" is not a significance criterion should be substantiated per CEQA Guidelines §15128. CEQA Guidelines §15228 also allows such statements to be included in an attached copy of an Initial Study. Appendix 1C of the Draft EIR contains the Initial Study. However, permits and the North Richmond Specific Plan already provide for ongoing resource recovery for at least 30 years after the landfill closes.
- 8-30. This comment suggests additional photosimulation to characterize the appearance of the landfill sideslopes after biosolids application. Additional information, including photographs, has been generated to respond to this comment and is included in Chapter 4 of this Response Document. No significant adverse impact on the scenic quality of this vista is expected.
- 8-31. This comment suggests that the visual impacts of the Project to Trail users be considered. As discussed in the Trail Development Plan (Appendix 3K of the Draft EIR), the goals are to provide recreational and increased access to the Bay shoreline, and to offer a setting for wildlife viewing and environmental education. The commenter's assertion that the Project site is part of the scenic resource is incorrect. It is recognized that the Trail would be on private property, that the WCCSL is located in an industrial setting of North Richmond, and that the facility is an operating, integrated solid waste management and disposal facility. Thus, Trail users whose presence would be elective and short-term in nature are not considered sensitive receptors. The Applicant, however, would make certain improvements with the Trail users in mind such as constructing an elevated landscaped berm with fencing along the southern and western boundary of WCCSL Area A which will soften the appearance of Area A facilities and buffer the Trail users from the WRC if it is located at the Area A location. Additionally, the Applicant would be subject to the requirements of revised use permits and would modify their existing Architectural Design Plan and Landscaping Plan as needed to assure that appropriate aesthetic improvements are made. Also, see other comment letters from trail organizations and agencies in this Response Document (letters 3, 5, 11, 13, and 14).

- 8-32. This comment suggests the WRC should be shown on Figure 7-5 in its Alternative A location. The WRC at Area A is not the proposed Project but is actually an alternative to the Project and therefore addressed in Chapter 13 of the Draft EIR. Please see Figure 13-5 in Chapter 13 of the Draft EIR for a visual simulation of the WRC at the Area A location.
- 8-33. The commenter has suggested that the EIR, contrary to the CEQA Guidelines, should have used a different baseline for evaluation of environmental impacts of the proposed Project, particularly with respect to air quality and traffic analyses. The commenter has urged that a hybrid environmental baseline consisting of the existing landfill and resource recovery operations, together with operations in the initial stages of the Project (assuming its approval) should be used, on the argument that it is possible (in the opinion of the commenter) that both proposed Project and existing condition could co-exist for a short period of time.

With respect to establishment of the environmental baseline against which project impacts are to be evaluated, the CEQA Guidelines provide that an initial study must identify the “environmental setting” before assessing the effect of the project (Guidelines §15063(d)(2).) The Resources Agency amended Section 15125(a) of the Guidelines in 1998 to define “environmental setting” as “the physical environmental conditions in the vicinity of the project, as they exist at the time . . . environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant . . .” (Guidelines, §15125(a).) The County, as Lead Agency, has utilized conditions at the time of the NOP as the most accurate and reliable baseline against which to measure effects of the Project.

The commenter is apparently urging that a different baseline be used in the EIR that would include both the current landfill operations as well as the operations under the proposed Project (including the transfer of waste and commencement of enhanced resource recovery operations) on the theory that both such operations could co-exist for a short period of time. The commenter is suggesting that the EIR should assume that the WCCSL landfill is continuing to operate, taking vehicles for disposal *in addition to* the waste-bearing vehicles that would use either the new WRC transfer station or the IRRF. The County, as Lead Agency, respectfully disagrees with the commenter’s suggested approach, as it is not consistent with CEQA. Furthermore, it would be misleading, based on speculation, and contrary to the facts before the Lead Agency. Use of such an artificial baseline would therefore result in an inaccurate analysis of environmental impacts of the proposed Project, contrary to the goals of CEQA.

The County has properly determined that the baseline condition against which the proposed Project is to be measured is the current operations at permitted levels, which will be the environmental setting in existence leading up to, and immediately prior to, the implementation of the proposed Project were it approved. The Lead Agency has discretion under CEQA Guidelines Section 15126.2 to determine the most appropriate baseline conditions against which the projects impacts will be measured. *See, e.g., Napa*

Citizens for Honest Government v. Napa County Board of Supervisors (2001) 91 Cal.App.4<sup>th</sup> 342, 363. In Napa Citizens for Honest Government, the EIR properly assessed a project's traffic impact in light of expected future conditions. See also, Fairview Neighbors v. County of Ventura (1999) 70 Cal.App.4<sup>th</sup> 238.

The basic timeline for the Project is that the landfill will close, and the existing WCCSL Landfill traffic and disposal operations will be directed to a new WRC transfer station and/or the IRRF. Among the reasons for the County's determination are the following:

1. The premise of the commenter's argument, that the transfer operations and the landfill disposal operations would co-exist for a period of time, is not a plausible scenario and the commenter has not presented any evidence suggesting it is either plausible or a reasonable interpretation of the facts. In fact, transfer operations *would replace the landfilling operation*. In short, the operations of the landfill and a transfer station are not concurrent or cumulative as the commenter is suggesting, but rather they are mutually exclusive. The EIR has evaluated the impacts associated with the proposed WRC which provides for the volumes of solid wastes that are currently disposed of in the West County Landfill (WCCSL), and some additional capacity for new business.
2. With regard to the franchised waste stream subject to the Authority's purview, that volume is currently disposed of in the WCCSL. It will either be (1) transferred via the IRRF when the landfill closes, or (2) transferred via the Applicant's proposed transfer station should the Applicant and the Authority reach an agreement for such an action. That matter is not the subject of this EIR and is not before the Lead Agency.
3. The self-haul tonnage currently disposed of in the WCCSL would be transferred via the Applicant's proposed transfer station once the WCCSL closes pursuant to the proposal evaluated in this EIR.
4. The traffic route to access either the IRRF or the WRC for purposes of estimating the Authority-franchised solid waste is the same for either the IRRF or the WRC transfer station – the Richmond Parkway. The only difference is whether those vehicles would make a turn onto Pittsburg Avenue to access the IRRF, or a turn onto Parr Avenue to access the WRC transfer station. The latter route is the current route for these Authority vehicles, so there is no change in the traffic pattern from the existing condition.

As such, there is no plausible or factually supported scenario by which the WCCSL, the IRRF and the WRC transfer station are all operating at full capacity so as to suggest a different baseline for Project impacts should be used. It would be speculative and inaccurate to analyze such a scenario, and to do so would be inconsistent with CEQA.

- 8-34. This comment requests further information on the number of parking spaces proposed for the Trail parking area. The Applicant anticipates that the Trail will have significantly less usage than the Wildcat Creek trailhead (which also serves the nearby Bay Trail segment). Thus, 19 parking spaces have been planned at the WCL compared to 35 parking spaces located at the Wildcat Creek trailhead. However, it is important to note that no change in parking is proposed as part of this Project; only a change in alignment and phases are proposed as part of this Project.
- 8-35. This comment requests further explanation of the right-most column of Table 8-4. “All other vehicles” is just a catch-all phrase to account for the unusual traffic that occurs at any landfill. It can include visitors, mid-day trips by on-site employees, maintenance vehicles, deliveries by UPS, and others. No modification to footnote “b” in Table 8-4 is necessary.
- 8-36. This comment suggests that traffic control measures in Section D3 be described in greater detail. The management and scheduling techniques referenced on Page 8-18 are regarding the peak commute hours on the Richmond Parkway and the I-80 freeway. During those hours, the garbage route collection trucks are either still on the collection routes or will have completed the work for the day. The trucks that would be scheduled by the Applicant to avoid congestion are the Project transfer vehicles that will carry the wastes from the WRC to the Potrero Hills Landfill in Solano County. These are vehicles that will be directly affiliated with the WRC either as being operated by the company or contracted to provide the hauling services for the company. The number of transfer trips per hour leaving the facility or inbound are anticipated to only be between 3 and 5 trips. The other vehicles that may be involved are those transporting in concrete or green materials for recycling at the facility, or the trucks removing the products for use off site. These vehicle operators are working on a timed basis and wish to avoid road congestion; hence following good business practices they will schedule the loads to avoid the times of traffic congestion. The Applicant reports that self-haul vehicles normally reach the site throughout the entire day. The WRC may offer an earlier opening time in the morning if business supports it, and the self-haul vehicle deliveries will be finished by the evening commute time. The proposed Project traffic would not result in any significant traffic capacity impacts.
- 8-37. This comment suggests the adequacy of Mitigation Measure 8-3 is questionable. The County and not the City of Richmond is responsible for roadway maintenance for all roads in the unincorporated area including Parr Boulevard. The mitigation measure as described was developed consistent with procedures used by the County Public Works Department in assessing pavement condition. No additional response is required.
- 8-38. This comment suggests that signage and striping alone may not provide sufficient safety for Trail users when crossing the landfill entrance. The Draft EIR considers the measures to be adequate in the foreseeable future. No change is proposed as part of this Project. Pedestrian safety was addressed in the prior Negative Declaration associated with the Class I site.

- 8-39. This comment requests further consideration of assumptions in Appendix 8A, page 4, regarding inbound and outbound traffic. These data are representative of the traffic patterns occurring at the landfill. Traffic patterns will differ during the seasons of the year, by month, by day of the week, and by other factors. The data are intended to illustrate typical traffic conditions. It is not unusual to have an individual 24-hour traffic count of a different total for entering and leaving vehicles, because there are employees coming in and out at all times of the day and night. The “missing” trips reflect vehicles that may be parked or stored within the landfill at the time of the count.
- 8-40. This comment requests further consideration of assumptions in Appendix 8A, page 6, regarding nighttime traffic. There is a minimal level of activity at a landfill at all times throughout the night, which is typical of landfill activities. This volume has been considered in the traffic analysis.
- 8-41. This comment requests further consideration of assumptions in Appendix 8A, page 16, regarding commercial traffic data. It is agreed the August data are somewhat unusual. Traffic studies, however, are based on average or typical conditions, not on a short-term anomaly.
- 8-42. This comment correctly identifies editing errors on page 10-3. These revisions are included in Chapter 4 of this Response Document.
- 8-43. This comment correctly identifies an editing error on page 10-6. This revision is included in Chapter 4 of this Response Document.
- 8-44. This comment correctly identifies an editing error on page 10-7. This revision is included in Chapter 4 of this Response Document,
- 8-45. This comment suggests Chapter 10 of the Draft EIR include clarification on the LEA’s regulatory authority relative to odor. Appropriate revisions to page 10-8 are included in Chapter 4 of this Response Document.
- 8-46. This comment suggests there is insufficient information presented to confirm the accuracy of existing and future emission estimates. Appendix 10A to the Draft EIR has been expanded to include a statement of the assumptions used in the calculations shown in the spreadsheets and the estimated emission inventories prepared by the BAAQMD and included in the permits for current operations on the site. These BAAQMD inventories were the source of estimated existing process and other emissions on the site and provided in the soil-handling emission rate. The revised appendix is included in Appendix B of this Responses to Comments Document.
- 8-47. This comment suggests Tables 10-4 through 10-6 should be reworked to include composting emissions. Recent studies of emissions from composting operations were described and evaluated on page 10-16 of the Draft EIR. Based on conversations with Carol Allen, the BAAQMD permit engineer for the facility, composting ROG emissions

were not identified as a source that adds to the regional emission burden as described on page 10-12 of the Draft EIR and, accordingly, not included in Tables 10-4 through 10-6.

- 8-48. This comment suggests the ROG emissions in Tables 10-4 through 10-6 should be reworked. ROG emissions from the landfill gas collection system were included in the inventory of existing sources on the site (Table 10-4 of the Draft EIR) but inadvertently omitted from the emissions estimates for the Project in 2008 and 2015. The spreadsheet of process emissions in Appendix 10A of the Draft EIR has been revised to include this small source with the corrected spreadsheets included in Appendix B in this Responses to Comments Document. Future emissions were assumed to be proportional to the amount of landfill gas created. Tables 10-5 and 10-6 of the Draft EIR have been revised to reflect this source of ROG emissions and are included in Chapter 4 of this Responses to Comments Document. While the numerical value of impact shown in Tables 10-5 and 10-6 has increased slightly, conclusions regarding the significance of impacts are unchanged.
- 8-49. This comment correctly notes that emissions from on-road vehicles should include re-entrained road dust on paved roads. Using the California Air Resources Board's *Areawide Source Methodologies Section 7.9 Entrained Paved Road Dust Paved Road Travel*, an average PM<sub>10</sub> emission factor of 0.427 grams per mile was estimated for Contra Costa County. This emission factor is the most recent available and is specific to Contra Costa County. This factor was multiplied by project VMT and the result added to exhaust emissions. Tables 10-4, 10-5 and 10-6 have been modified to reflect this change and are included in Chapter 4 of this Responses to Comments Document. While the numerical value of impact shown in Tables 10-5 and 10-6 has increased slightly, conclusions regarding the significance of impacts are unchanged.
- 8-50. This comment suggests the emission inventories in Tables 10-5 and 10-6 should be reworked to include expected increase in VMT in future years. The average trip lengths of 20 miles were estimates and thought to be conservative. Trips to the Potrero Landfill would be longer than this average, but only comprise 3.4 percent of the truck trips to/from the proposed Project at buildout. To account for this longer trip length, diesel truck VMT was increased by 1,160 in 2008 and 1,360 in 2015 to account for the 40-mile round-trip trip length difference between the average and actual trip distances. These changes are reflected in the spreadsheet printouts in Appendix 10A and in Tables 10-4, 10-5 and 10-6 of the Draft EIR, which are included in Chapter 4 of this Responses to Comments Document. While the numerical value of impact shown in Tables 10-5 and 10-6 has increased slightly, conclusions regarding the significance of impacts are unchanged.
- 8-51. This comment correctly identifies an editing error on page 10-17. This revision is included in Chapter 4 of this Responses to Comments Document.
- 8-52. This comment suggests that the Project could result in exceedences of ROG and NO<sub>x</sub> threshold criteria and could impede the region's ability to reach attainment for ozone. See response to comment 8-47 regarding composting emissions. See response to

comment 8-48 regarding landfill gases not captured by the landfill gas system. See response to comment 8-50 regarding the effect of longer-than-average vehicles trips to Potrero Landfill. Tables 10-4, 10-5 and 10-6 have been revised to reflect updated emissions estimates and are included in Chapter 4 of this Responses to Comments Document. While the numerical value of impact shown in Tables 10-5 and 10-6 has increased slightly, conclusions regarding the significance of impacts are unchanged.

- 8-53. This comment correctly identifies an editing error under Impact 10-9. This revision is included in Chapter 4 of this Responses to Comments Document.
- 8-54. This comment suggests the Project could also result in significant unavoidable cumulative impacts for ROG and NO<sub>x</sub>. See response to comment 8-52. BAAQMD CEQA Guidelines provides that project effects that are singularly significant will also be cumulatively significant. Project impacts on ROG and NO<sub>x</sub> emissions were found to be less than significant, and emissions of these pollutants from on- and off-site sources will be trending down over time with the proposed Project. Based on the analysis of emissions and BAAQMD significance thresholds, the Project would not have a significant cumulative impact on ozone precursors.
- 8-55. This comment correctly identifies an editing error on page 11-7. This revision is included in Chapter 4 of this Responses to Comments Document.
- 8-56. This comment suggests addition of a significance criterion to page 11-18. The last bullet under Section C on page 11-8 is the suggested criterion. No additional response is required.
- 8-57. This comment currently identifies an editing error on page 11-6. This revision is included in Chapter 4 of this Responses to Comments Document.
- 8-58. This comment correctly notes that noise attenuation from line sources alternate at a rate of 3 to 4.5 dBA. Changes to the text on page 12-3 are included in Chapter 4 of this Responses to Comments Document.
- 8-59. This comment suggests that noise measurement data were summarized in a table and a figure be included showing locations where measurements were taken. Appropriate revisions, including a new Figure 12-1, are included in Chapter 4 of this Responses to Comments Document.
- 8-60. This comment suggests that page 12-7 of the Draft EIR should describe whether or not the County has a noise ordinance that would apply to the Project. The County does not have a quantitative noise ordinance that would limit landfill noise emissions. A revision to the text for page 12-7 of the Draft EIR is included in Chapter 4 of this Responses to Comments Document.
- 8-61. This comment suggests further clarification on page 12-9 of the Draft EIR regarding the significance of a 3 dBA increase. The 3 dBA increase in ambient noise levels is either



hourly  $L_{eq}$  or DNL. A revision to the text on page 12-9 of the Draft EIR is included in Chapter 4 of this Responses to Comments Document.

- 8-62. This comment suggests the noise chapter of the EIR does not acknowledge that the noise environment at residential areas along haul routes exceed the 60 DNL standard for residential users. A revision to the text on page 12-6 of the Draft EIR is included in Chapter 4 of this Responses to Comments Document.
- 8-63. This comment requests further clarification regarding why noise from increased truck traffic during nighttime hours would be less than significant. This determination is based on the fact that the volume of Project traffic projected under cumulative conditions is expected to be 43 percent greater than existing. Assuming that the truck percentage remains the same, the hourly  $L_{eq}$  and DNL would increase by 1.6 dBA, which is less than significant. Revision to the text of Impact 12-4 is included in Chapter 4 of this Responses to Comments Document.

**THE BEAUTIFICATION COMMITTEE OF NORTH RICHMOND**

The Senior/Multicultural Center, 515 Silver Street, Richmond, CA 94801

**December 22, 2003**

**DRAFT ENVIRONMENTAL IMPACT REPORT  
(STATE CLEARINGHOUSE # 2002102057)**

**Proposed Amendment of Land Use Permit  
For the Bulk Materials Processing Center and Related Actions  
At the West Contra Costa Landfill**

Contra Costa County  
Community Development Department  
651 Pine Street, 4<sup>th</sup> Floor, North Wing  
Martinez, CA 94553  
**For the Attention of:** Deidra Dingman  
Solid Waste Program Manager

Dear: Ms Dingman

**The location of a transfer station**

We support the location of the transfer station at the Landfill and not at the Pittsburgh site because the adverse environmental impacts of the processes at the Transfer Station will have a direct impact on the residents of North Richmond. In particular the number of diesel trucks will increase and the emissions from these trucks will increase the likelihood of our children getting asthma, in a community that has one of the highest levels of hospitalization for asthma in Contra Costa County.

9-1

**Mitigation Fees**

We support that mitigation fees of \$2.72 per ton on all solid waste and processible materials be given to the North Richmond community because the following environmental effects will impact the community as a result of the location of the Bulk Materials Processing facility in North Richmond.

9-2

- The odors from Composting process
- Particulate matter from Concrete/Asphalt processing and wood recovery process
- Air pollution from diesel emissions and soot from the trucks
- Soil contamination and degradation of water.
- Noise pollution from the various activities at the landfill/transfer station.
- Some destruction of the wetlands because of the modifications to the shoreline of the San Pablo Bay which may disrupt wildlife habitat and wildlife movement opportunities in the area.

We agree with all the mitigation measures listed on the Environmental Impact Report but will want in addition that a portion of the mitigation fees be dedicated to the health of the community. We shall want the County Health Department to use the funds to work on programs for Asthma and Cancer for the residents of North Richmond with a non-profit Community organization located in North Richmond.

9-3

Sincerely,

A handwritten signature in black ink, appearing to read 'Lee Jones', with a long horizontal flourish extending to the right.

**Lee Jones**

North Richmond Beautification Committee – **Chair**.

**LETTER**  
**#9**  
**RESPONSE**

The Beautification Committee of North Richmond  
Lee Jones, Chair  
December 22, 2003

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- 9-1. This comment expresses support for the location of the transfer station at the WCCSL rather than the existing Central IRRF location. No response is necessary.
- 9-2. This comment expresses support for the current mitigation fees on solid waste processed in the North Richmond area, and points out a range of impacts to the local community. These impacts include odors from composting, particulate matter from bulk material processing, air pollution, soil and water contamination, noise pollution, and destruction of wetlands. It should be noted that all of these impacts are addressed in detail in their respective chapters in the Draft EIR. With the exception of a potential significant impact related to particulates (PM<sub>10</sub>), no significant impacts are expected related to odors, soil or water quality contamination, noise, or loss of wetlands.
- 9-3. This comment also expresses support for mitigation fees and requests that a portion of the fees be dedicated to the health of the local community. This comment relates to the proposed mitigation fee described in Mitigation Measure 4-5. Item (a) of Mitigation Measure 4-5 states that the mitigation fee would be subject to the joint control of the City and County. Funds would be used to defray costs of illegal dumping and associated impacts in North Richmond and adjacent areas. The mitigation measures related to health are in Chapter 10, Air Quality, and Chapter 11, Health and Safety.



03 DEC 15 PM 2:41

December 8, 2003

Ms. Deidra Dingman  
 Solid Waste Program Manager  
 Contra Costa County Community Development Dept.  
 651 Pine Street, 4<sup>th</sup> Floor North  
 Martinez, CA 94553

Re: Comments on EIR for West County Bulk Materials Processing Center  
 and related activities

Dear Ms. Dingman:

The Richmond Chamber Board of Directors endorses the proposals by Republic Services of Northern California for the post-closure uses of the West Contra Costa County Sanitary Landfill and surrounding area. We would like to have our support on the record as part of the consideration of the Environmental Impact Report.

The increased processing volumes that the new facilities will provide will improve waste handling for the business community and achieve economies of scale which could benefit both business and residential customers.

Because the transfer facility and new proposed uses will generate additional traffic, it is appropriate that these uses be clustered together in a single area to minimize the area affected. The industrial nature of the properties to the west of the Richmond Parkway along Parr Avenue makes this site the best neighborhood for such activity. Republic's proposals attempt to address the traffic impacts: a short, direct route to get to the Parkway and the scheduling of haul off for night hours - means that potential impacts on Parkway traffic will be minimal. Impacts on Parkway traffic will be minimal.

10-1

We are aware that there is a competing proposal to locate the transfer facility at the current site of the Integrated Resource Recovery Facility off of Pittsburg Avenue. The changing nature of the neighborhood near this facility makes it less desirable as a site for the full transfer operations. Existing and planned residential projects adjacent to that site make increased traffic - both delivery and haul off - and the noise and odor impacts more difficult, if not impossible to mitigate. Recycling can and should continue at that site, but to expand that facility should require another look at the environmental impacts. Too much time has elapsed since the EIR was done, and it must be updated and revised to reflect current conditions and the changing land uses in the surrounding neighborhoods and community. This is a community in transition and we support efforts to revitalize this area. Placing heavy industrial uses at the landfill site seems both appropriate and necessary to help ensure the vitality of the North Richmond area.

10-2

Sincerely,

Judith Morgan  
 President

**LETTER**  
**#10**  
**RESPONSE**

Richmond Chamber of Commerce  
Judith Morgan, President  
December 8, 2003

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- 10-1. This comment expresses support for the proposed Project, including locating the transfer station at the WCCSL rather than at the Central IRRF location. No response is necessary.
- 10-2. This comment incorrectly suggests that there is a “competing proposal” to expand the Central IRRF as a transfer facility. Expansion of the Central IRRF to operate as a transfer station was permitted in 1993 and is not part of the proposed Project. The EIR addresses the expanded IRRF operation in the No Project Alternative and the cumulative analysis. Also see response 9-1 for additional discussion of this issue.

1600 Broadway, Suite 300  
Oakland, CA 94612-2100

t. 510.452.9261  
f. 510.452.9266

www.savesfbay.org

03 DEC 23 PM 1:59

December 19, 2003

Ms. Deidra Dingman  
Solid Waste Program Manager  
Community Development Department  
Contra Costa County Administration Bldg.  
651 Pine St., 4<sup>th</sup> Floor, North Wing  
Martinez, CA 94553-0095

Dear Ms. Dingman,

RE: WCCSL Bulk Materials Processing Center Nov. 2003 DEIR

Save The Bay would like to submit the following comments for consideration on the WCCSL Bulk Materials Processing Center and Related Actions Draft EIR:

#### Public Access

1. **The 0.5-mile Bay Trail spur to the southern breach in the outer levee should be included in Phase I.** The WCCSL Bay Trail Loop Committee, including representatives from ABAG, BCDC, City of Richmond, Contra Costa County, Neighborhood House of North Richmond, Save The Bay, Sierra Club, and TRAC, endorsed a public access plan that defined a ½ mile spur to the southern breach in the levee in Phase I. However, the current DEIR shows, incorrectly, this spur as part of Phase 4 (Fig. 3-7, p. 3-39). 11-1
2. **The Phase 4 Bay trail route on the outer levee segment now isolated by breaches should not be eliminated.** The multi-use trail around the outer levee of the landfill, including the section isolated by breaches is included in the North Richmond Shoreline Specific Plan. The DEIR recommends deletion of this Phase 4 trail even though no evidence is presented of use by nesting, roosting or resting birds—and therefore no evidence of significant adverse environmental effect. There is also no evidence presented in the DEIR that human access associated with the Phase 4 trail would "...diminish and possibly eliminate the use of this area by many species" (Section E4, p. 13-46). 11-2
3. **"Poison Oak" and "California blackberry" plant species proposed for the trail "barrier planting" should not be used.** There is no evidence that a barrier planting is needed to protect foraging birds. The plant species listed in Appendix 3K (Bayside Trail Planting Recommendations) include "poison oak," to which many individuals are acutely allergic, and "California blackberry," which has the potential to spread and require 11-3



management controls. Many of the other plant species listed in Appendix 3K could, however, provide vegetative enhancement and habitat for trail users and wildlife.

4. **Save The Bay supports appropriate access for canoes and kayaks to the shoreline at the southern end of Area C.** A canoe and kayak launch staging area should have minimum impact to the site and require the minimum feasible use of new fill. Save The Bay's "Canoes in Sloughs" program, which serves over 4,000 students annually, would support a launch at this site to expand its programs to this region of San Francisco Bay. Any launch should accommodate only self-powered boats.

11-4

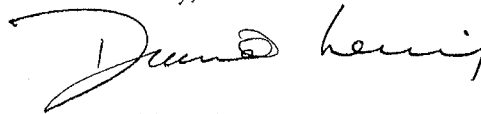
#### **Sewage Sludge & Dredge Material**

1. **Amounts and sources of sewage sludge to be processed should be specified.** The DEIR does not include sufficient information to determine the current amount of sewage products piped into the landfill. The DEIR is not clear on the source and amount of materials proposed for sewage sludge processing. The project describes "...spreading of wet dredged materials and/or biosolids (wastewater sludge) from the adjacent WCWD treatment plant..." (3.C.2.g). However, the proposed permit capacity for dredged material and biosolids exceeds what the WCWD plant now produces. The DEIR should clearly state what portion of the capacity amount would be made up of sewage and if this is more than the amount projected to be produced by WCWD.

11-5

We hope these comments will be helpful and thank you for your consideration.

Sincerely,



David Lewis  
Executive Director



**LETTER  
#11  
RESPONSE**

Save the Bay  
David Lewis, Executive Director  
December 19, 2003

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- 11-1. This comment correctly points out an error in the description of the Public Access Trail on Figure 3-7. This error has been corrected and the revised figure is included in Chapter 4 of this Responses to Comments Document.
- 11-2. This comment questions the analysis and conclusions related to the elimination of Phase 4 of the Public Access Trail. See response to comment 3-2. No additional response is required.
- 11-3. This comment questions the use of poison oak and blackberry as vegetative barriers along the Public Access Trail. See response to comment 3-3. No additional response is required.
- 11-4. This comment expresses support for the canoe and kayak staging area. See response to comment 3-2 for a discussion of the proposed kayak and canoe access to the Bay, and the need for seasonal restrictions to protect important nesting habitat in the nearby marshlands.
- 11-5. This comment requests further information on the amounts and sources of sewage sludge to be processed. No “sewage” would be received at the WCL. Sewage sludge or biosolids are proposed to be processed from various wastewater treatment plants in the San Francisco Bay Area similarly to the current Alternative Daily Cover (ADC) program where biosolids materials are now received at the WCL from San Mateo County, Alameda County and Contra Costa County. The WCWD treatment plant produces biosolids that are currently processed in the drying lagoons located at that plant. Current management practices involve removing the dried material in the fall season and utilizing it at the WCL. According to the Applicant, about 10,000 tons per year of the dried material are processed from the WCWD plant. Approximately an equal amount of dried biosolids are removed from the drying lagoons that were from the City of Richmond wastewater treatment plant. If these plants were to utilize mechanical dewatering equipment that produce biosolids cake at higher moisture contents, then the weight of the biosolids would greatly increase. The 50,000-ton proposed permit capacity would apply to the lagoon dried materials or to dewatered biosolids from other treatment plants in the region. The 50,000-ton limit would also include dredged material placed on the slope. This limit applies to the southern slope spreading and drying area.



**San Francisco Bay Chapter**

Serving the counties of Alameda, Contra Costa, Marin and San Francisco

December 18, 2003

Deidra Dingman  
Contra Costa County  
Community Development Department  
651 Pine Street, 4<sup>th</sup> Floor, North Wing  
Martinez, CA 94553

Subject:

Dear Ms Dingman,

The Sierra Club would like to comment on several aspects of this draft EIR. Our comments are on the following pages.

Thank you for your attention,

Debbi Landshoff  
Conservation Chair, West Contra Costa Group of the Sierra Club

# SIERRA CLUB COMMENTS ON WCCSL BULK MATERIALS PROCESSING CENTER AND RELATED ACTIONS DRAFT ENVIRONMENTAL IMPACT REPORT

## 1. The draft EIR miscalculates the increase in traffic

It is clear that the vehicle traffic in to and out from the landfill has been severely underestimated.

12-1

By my calculations, the proposed operations will cause at least 5 times as much material to be trucked to and from the landfill, as is now the case. The draft EIR shows a much lower increase.

### ***Draft EIR's traffic numbers***

Table 8-4 in Section 8.A.2.a states that the current traffic volumes for Class II landfill, composting, concrete/asphalt processing, importing landfill cover soil, and various minor activities is 2,250 vehicles per day. Table 8-7 in Section 8.A.2.c states that the anticipated 2015 traffic volumes for waste recycling, composting, concrete/asphalt, wood recovery, soil reclamation, and other/miscellaneous activities is 3,220 vehicles per day.

These tables break down the traffic into four types: collection trucks, other large trucks, self-haulers, and vehicles used by site employees, visitors, and suppliers. If we include only the vehicles used for importing waste materials and exporting waste products and trucking to an outside landfill, the numbers would be as follows:

| Current conditions |       | Anticipated 2015 conditions |       |
|--------------------|-------|-----------------------------|-------|
| Collection trucks  | 460   | Collection trucks           | 340   |
| Other large trucks | 320   | Other large trucks          | 820   |
| Self-haulers       | 850   | Self haulers                | 1,480 |
| TOTAL              | 1,630 | TOTAL                       | 2,640 |

### ***Calculations of tons trucked in and out per year***

The draft EIR does not have a direct comparison the current and proposed tonnage. This is one of the elements that are required to calculate the changes in vehicle traffic. The figures below are extrapolated from data in the draft EIR.

12-2

**Current:** tonnage imported to the landfill each year:

| Activity         | Tons per year | Reference                    |
|------------------|---------------|------------------------------|
| Composting       | 10,000        | 2.A.1.a.                     |
| Concrete/asphalt | 125,000       | 2.A.1.b.                     |
| Wood recovery    | 30,000        | 2.A.1.e.                     |
| MSW at landfill  | 240,000       | 3.B.2 (measured as 650 TDP7) |
| Sewage sludge    | 0             | Currently piped in           |
| TOTAL            | 405,000       |                              |

### **Current imports plus exports**

Of this tonnage, up to 165,000 tons per year (the total tonnage less the municipal solid waste that remains at the landfill) is trucked out. Thus the materials currently trucked in to and out from the landfill are something like  $405,000 + 165,000 = \underline{570,000}$  tons per year.

**Projected** tonnage imported to the landfill each year:

| Activity                    | Tons per year | Reference                                    |
|-----------------------------|---------------|----------------------------------------------|
| Composing                   | 164,300       | 2.A.1.a.                                     |
| Concrete/asphalt            | 528,000       | 2.A.1.b.                                     |
| Waste recycling             | 365,000       | 2.A.1.c                                      |
| Wet/dusty materials         | 51,100        | 2.A.1.d                                      |
| Wood recovery               | 131,400       | 2.A.1.e.                                     |
| Soil reclamation            | 195,000       | 2.A.1.f                                      |
| Biosolids/Dredged materials | Unknown       | 2.A.1.g (may all be piped)                   |
| TOTAL                       | 1434,800      | More if sewage, dredge materials are trucked |

### **Projected imports plus exports**

At least an equal amount would be trucked out from the landfill. Thus the materials projected to be trucked in to and out from the landfill are something like  $1434,800 \times 2 = \underline{2,869,600}$  tons per year.

Projected increase in volume

Using the figures about, the projected trucking numbers (even excluding biosolids) would be  $2,869,600 / 570,000$  for a five-fold increase.

### ***Traffic numbers and calculations should be more complete and consistent***

To correct this problem, the EIR should take an apples-with-apples approach, clearly listing the amounts of each type of material presently imported in to and exported from the landfill as well as the same numbers as projected for the proposed project. The tonnage should include all types of materials, including sewage sludge and dredged materials.

12-3

Then, the EIR should recalculate the numbers and types of vehicles from these numbers, using a consistent and clearly defined formula for each type of vehicle.

### **2. The draft EIR is unclear about the source and amount of materials for the proposed sewage sludge processing.**

The draft EIR does not provide adequate baseline numbers for the sewage products currently piped into the landfill and does not provide adequate information about the projected operations.

12-4

The project description (3.C.2.g) says that the biosolids/dredged material spreading operation “would involve the spreading of wet dredged materials and/or biosolids (wastewater sludge) from the adjacent WCWD treatment plant on the southern or eastern sideslopes of the closed landfill.”

The proposed permit capacity for the combined dredged material and biosolids operation is 50,000 tons per year, clearly an amount in excess of what the WCWD plant produces. The EIR should clearly specify the amount of this 50,000 tons that would be made up of sewage and whether this is more than the amount projected to be generated by WCWD.

**3. The significance of traffic and circulation impacts, as covered in chapter 8, should be reanalyzed to account for re-estimated traffic volumes.**

Because many traffic and circulation impacts of the project are based on an incorrect estimate of the increase in traffic, their significance must be revised and the mitigations must be revisited. The impacts should be analyzed by type of vehicle, since the impacts of collection trucks and other large trucks are much greater than the impacts of self haulers.

12-5

The need for reanalysis applies to, but is not limited to:

- Roadway and intersection capacity
- Pavement deterioration, especially on Parr and the Richmond Parkway

**4. Mitigation measure 8-5 would not adequately protect pedestrian safety**

It is unreasonable to expect that pavement striping and signage that tells motorists to stop for pedestrians would actually cause trucks to stop and allow pedestrians to continue safely on the Bay Trail. Drivers notoriously disregard such signs, especially on private property not patrolled by City or County traffic officers. Such a measure was acceptable to the trail design committee when the expectation was that landfill operations would be limited to current recycling operations and self-haulers, but is not adequate in a greatly expanded operation. The applicant should work with professional trail planners and traffic design engineers to find a usable approach.

12-6

**5. The control measures proposed to address potential impacts of the trail on special status species are not an adequate solution to the problem**

As the mitigation for impact 9-1, the applicant proposes to discourage access into the marsh and mudflats at low tide by planting thorny shrubs and vines such as wild rose and blackberry, and possibly poison oak.

Planting poison oak is a particularly bad idea: poison oak poses a serious health risk to sensitive individuals who even come near the plants; it is often difficult to recognize in the winter; even if warning signs are posted, many visitors may not be able to read such signs, especially if they are written in English.

12-7

Some of the other listed species are notorious for spreading beyond the area in which they are planted. If they are selected, the applicant should prepare detailed plans describing how they will be controlled so they do not grow into the trail area.

12-8

The EIR recommendation as mitigation for impact 9-1 is a fence, not the barrier plantings. This is confusing. Should the applicant build and fence *and* create barrier plantings?

12-9

A fence might be a preferred method to keep people and predators out of sensitive areas, but the draft EIR does not specify anything about the height, construction materials, or location of a fence, so it is not clear whether such a fence would be compatible with the recreation values of the trail.

An alternative mitigation measure might be to specify that ABAG Bay Trail planners, Trails for Richmond Action Committee members, and appropriate regulatory agencies, and the applicant design appropriate barriers working in cooperation with each other.

## **6. The plant list in Appendix 9A should be improved or eliminated.**

Appendix 9A consists of a list of plants intended to serve as a vegetative buffer between sensitive creek and marsh habitats adjacent to the landfill and the future trail and water recreation users. This list should be composed of species indigenous to the North Richmond Area. Wildlife needs might be enhanced if the plants are attractive to locally native birds, insects, and mammals. The plants should be able to compete with alien species without being unduly invasive themselves. They should have a good possibility for survival in the conditions of the landfill area.

12-10

This plant list seems to be overly generic for these purposes (there are many *Ceanothus* species, for example, not all of which would be suitable at this location). The list does not necessarily include plants that might be very useful.

The list should be improved to reflect these values. Alternatively, a set of guidelines for selecting plants could be substituted for the plant list.

## **7. Measures to protect wildlife from predators are not necessarily appropriate.**

Mitigation measure 9-1-d, proposes to control predators that might be attracted by the trail as follows: “As directed by appropriate agencies, the Applicant would cooperate with efforts on predator control of feral cats, dogs, and red fox.” However, it is the experience of trail advocates that some agencies will always choose to prevent the creation of trails that might possibly pose a threat to wildlife. However, working in cooperation with those agencies, it is often possible to work out an agreeable solution.

12-11

Mitigation measure 9-4-d, further proposes to control predators by eliminating phase 4 of the trail. The applicant should, instead, make all possible effort to build the trail as designed. They could work with the ABAG Bay Trail Planners to find a solution that would be create the maximum usable trail that could be acceptable to wildlife protection agencies.

12-12

## **8. The significance of air quality and odor impacts, as covered in chapter 10, should be reanalyzed to account for re-estimated traffic volumes.**

Because many of the air quality and odor impacts of the project are based on an incorrect estimate of the increase in traffic, their significance must be revised and the mitigations must be revisited. The impacts should be analyzed by type of vehicle, since the impacts of collection trucks and other large trucks are much greater than the impacts of self haulers.

12-13

The need for reanalysis applies to, but is not limited to:

- On-road vehicle exhaust
- Fugitive emissions
- Diesel health risk assessment

## **9. Relying on proposed new emissions standards to offset increases in traffic is not appropriate.**

The analysis of Impact 10-3 states that proposed CARB Risk Reduction Plan “is expected to result in reductions in diesel exhaust particulates of 75 percent by 2010 and 85 percent by 2020.” This state mandated reduction is deemed to bring the impacts of the increased traffic below the standard for significance. However, the comparison should be between the pollution levels under CARB at current traffic volumes and with those at projected traffic levels.

12-14

**10. Trail closure is not an appropriate control measure to mitigate against the hazards created by spraying or spreading liquid biosolids.**

Control measure a for Impact 11-7 specifies that “during biosolids application, sensitive portions of the Trail would be closed for a 4- to 6-week period and areas fenced off to prevent public access until the materials are disked into the soil surface of the landfill cover.”

Although the draft EIR does not contain any schedule for the application of biosolids, it can be assumed that there would not be many days that do not fall into the 4- to 6-week period around one application or another of 50,000 tons per year. The planned Bay Trail segment is meant to be a loop. It would lose much of its recreational value if trail users could not travel through the entire loop and could not plan their visits to the trail knowing that the loop would be open.

12-15

The applicant should find a better mitigation measure or modify the biosolids program so it is not so hazardous to trail users.

**11. The draft EIR does not specify protections against the spread of plant pathogens other than *Phytophthora ramorum* (Sudden Oak Death)**

Mitigation Measure 11-11 specifies that the applicant comply with state rules that would prevent transporting of the pathogen out of a quarantined area as finished mulch. However, this measure would not protect from the spread of pathogens within the local area.

Additional effort should be made to control the spread of the many plant pathogens that are devastating our urban and woodland forests. If appropriate, the landfill operator might restrict the use of the windrow method of composting to plant species that are not generally hosts to communicable pathogens and to use only the aerated static pile method for species such as pine and oak that are more often infected.

12-16

**12. The significance of noise impacts, as covered in chapter 12, should be reanalyzed to account for re-estimated traffic volumes.**

Because many of the noise impacts of the project are based on an incorrect estimate of the increase in traffic, their significance must be revised and the mitigations must be revisited. The impacts should be analyzed by type of vehicle, since the impacts of collection trucks and other large trucks are much greater than the impacts of self haulers.

12-17

The need for reanalysis applies to, but is not limited to:

- General noise levels
- Extended hours of operation

**13. The draft EIR analysis of the Environmental Justice implications of the proposed project is inadequate**

It is very heartening to see the considerable attention paid in the EIR to the impacts of illegal dumping in the neighborhood of the landfill. The analysis and proposed mitigations need some refinement, and Sierra Club supports the comments by other parties to improve the mitigation requirements.

12-18

There should also be an analysis of the impacts of the increase in vehicular traffic on the neighboring communities of North Richmond, Parchester Village, and west San Pablo, including a more careful analysis of the impacts in the early-morning and late evening hours.

12-19

Because the draft EIR does not adequately count the amount of increased traffic, especially traffic from heavy vehicles, it does not adequately analyze the impact of increased noise, air emissions, and traffic in the local area. Noise and air pollution generated by the Richmond Parkway already have a very negative impact on the area, and the increased truck traffic would make a bad situation worse.

12-20

Particular care should be taken in analyzing the impacts of noise and pollution on Parchester Village, because the elevated position of the Richmond Parkway at that location exacerbates the impact of noise and air pollution on that community.

12-21

The surrounding communities already suffer from very high asthma rates; studies are ongoing as to the impact of the Parkway on these rates. The diesel risk assessment section seems to be limited to the cancer risk. If asthma were included, the risk assessment might have been considerably higher and might have been considered a significant impact.

12-22

#### **14. The draft EIR does not study the growth-inducing impacts of the project**

Assuming the high volumes of out-of-region materials processed at the landfill are achieved because low fees attract out-of-area businesses, the project would be growth-inducing for the region. It is generally understood that low garbage costs are a growth inducer because they make it easier for people and businesses to move into a region.

12-23

#### **15. The draft EIR does not adequately study regional impacts**

The noise, air quality, traffic, and roadway maintenance impacts of the increase in vehicular traffic, would also be felt throughout the region. The regional impacts were not adequately studied.

12-24

#### **16. The draft EIR lacks an analysis of the impacts on recreation**

The proposed increased landfill operations would have major impacts on the proposed Bay Trail segment. The trail segment is specified in planning documents such as the North Richmond Shoreline Specific Plan and the existing use permits. Richmond's Parks and Open Space zone designation for the area intended that the area revert to public use after 2023, but the proposed project is meant to use the area for waste recycling and disposal operations well beyond that date.

Among the impacts that should be analyzed within a recreational impacts section are:

- Closure of the trail portions during biosolids application would preclude use of the trail as a loop. It might also affect access to a kayak put-in.
- Heavy truck traffic would make it difficult for pedestrians and bicyclists to get to the staging area.
- Noise and odors would decrease enjoyment of the trail, and discourage use of the trail.
- Pedestrian safety requires a signal or other effective method of getting trucks to give pedestrians the right-of-way.

Impact 4-2 in section 4.D.2 state that "Users of the Trail are generally not considered to be 'sensitive receptors' in the EIR because their presence is elective and short-term in nature." Therefore the draft EIR analyzes the impacts of noise, odor, public health, and traffic and safety to trail users as being less than significant. However, when analyzed in the context of the impact on recreation, the issues take on much more significance, because they have the effect of discouraging potential users of the trail.

12-25



**17. The draft EIR fails to mitigate for the possible cumulative effects of waste transfer facilities at both the landfill and the IRRF**

Although the applicant has stated that they intend to relocate the transfer operations on the landfill site, there remains the possibility that they might use or sell their permit for use of the IRRF.

12-26

An appropriate way to prevent this eventuality would be to require the applicant to “give back” their permit for transfer operations at the IRRF as a mitigation for obtaining a permit for transfer operations at the landfill.

**18. The draft EIR fails to consider a reasonable range of alternatives**

The draft EIR does not consider an increase in operations that might satisfy the applicant’s goal to develop “capacity for new business” but yet have fewer adverse environmental impacts than the full project.

The EIR should consider a midway project that satisfies the need for disposal of waste generated in West Contra Costa but minimizes importation of waste materials from outside the West Contra Costa area.

With the exception of the “no-Project” alternative, all the alternatives studied rely on large increases that most likely depend on disposal fees that are considerably lower than the fees for other sites in the Bay Area. The EIR should add a mitigated alternative that increases capacity by a smaller amount, perhaps 25-50%. Demand for the landfill would be controlled by mitigation fees such as the \$13 per ton charged by San Jose or the Alameda County Source Reduction Recycling Surcharge (Measure D, 1990), which will be \$7.06 on Jan 1, 2004, but would remain strong enough to attract growth in operations.

12-27

Such a solution would allow the applicant to grow their business without making Richmond, once again, the dumping ground for the region.

The draft EIR should also include an alternative in which biosolids treatment is clearly limited to sewage sludge generated by WCWD. In this way the impacts of treatment of local sewage sludge could be compared to the impacts of the proposed 50,000 tons per year.

12-28

**19. Potential conflict between City and County administration of the landfill should be removed.**

The landfill is a single operating unit with a single road into and out from the site, but the entity with permitting and code enforcement responsibilities depends on the location of each operation within the site footprint. This situation makes for confusion and possibly conflicts about the setting and administration of mitigation fees or surcharges and the scope and extent of landfill operations increases. The landfill operator, Richmond, and Contra Costa County would all benefit from institution of a comprehensive joint permitting process.

12-29

**LETTER  
#12  
RESPONSE**

Sierra Club  
Debbie Landshoff  
December 18, 2003

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12-1. This comment suggests the Draft EIR severely underestimated the Project traffic projections. The traffic projections have not been underestimated. The projected 2015 traffic (Table 8-7 in the Draft EIR) is derived from calculations for both incoming and outgoing materials using the following procedure for each Project facility:

1. Estimate the percentage of each type of vehicle hauling material to and from the particular facility.
2. Estimate the bulk density of materials in each type of vehicle for material being delivered and recovered material.
3. Calculate the average weight of each type of vehicle for material being delivered and recovered.
4. Calculate the average daily (TPD7) weight of material received and recovered for hauling off site.
5. Calculate the average number of daily trips for each type of vehicle hauling material to and from the particular facility.
6. Estimate the number of other vehicles going to the particular facility.
7. Calculate ADT by doubling the sum of 5 and 6.

As indicated by the above procedures, the traffic estimates are based upon both the inbound loads of wastes and outbound loads of transferred wastes and recovered products. The data in the tables account for both the inbound trips and outbound trips of all vehicles. The analysis involved looking at vehicle size (self-haul, collection truck and other large trucks, and trailer trucks) for each activity proposed within the BMPC family of operations. Included are other vehicles such as those of employees, maintenance and fueling activities, inspectors and visitors. It should be noted that the wastes are delivered by smaller vehicles and the transferred wastes and recovered products are generally removed from the site by large trailer vehicles. Thus, over two-thirds of the 3,200 daily traffic trips for 2015 may be associated with waste delivery, while only about 1,000 trips are involved with transferring wastes or delivery of products to the markets.

Initially, the Applicant developed the 2015 traffic projections which were reviewed by Brown and Caldwell and Abrams Associates. Following a period of review and discussion, these projections were considered reasonable and complete for use in the Draft EIR. The Applicant's calculation sheets are included in this Responses to

Comments Document as Appendix C. Traffic projections for 2008 were developed using the assumptions stated in Section D.2.b of Chapter 8.

- 12-2. This comment suggests the Draft EIR does not have a direct comparison of current and proposed tonnages. See response to comment 8-26.
- 12-3. This comment suggests the projected tonnages and traffic numbers should be recalculated. Please see response to comment 12-1. The analyses in Chapter 8 were reviewed by staff of the County Transportation Planning Division and determined to meet their requirements and sufficient in terms of depth of analysis and accuracy.
- 12-4. This comment requests further information on source and amount of materials for the proposed sewage sludge processing. See response to comment 11-5.
- 12-5. This comment suggests the traffic and circulation impacts be re-analyzed based on correct traffic numbers. See response to comment 12-1.
- 12-6. This comment suggests that pavement striping and signage are not adequate safety measures for Public Access Trail users when crossing the landfill entrance. See response to comment 8-38.
- 12-7. This comment suggests that poison oak is not appropriate as a Public Access Trail planting. See response to comment 3-3 for information on appropriate Trail plantings and revisions to the Planting Recommendations contained in Appendix 9A of the Draft EIR. No additional response is necessary.
- 12-8. This comment suggests the Public Access Trail planting list contains species which are notorious for spreading and control plans are necessary. See response to comment 3-3. None of the recommended species from the Planting Recommendations in Appendix 9A of the Draft EIR are considered particularly invasive or problematic other than poison oak.
- 12-9. This comment suggests there is confusion in Impact 9-1 whether a fence or barrier plantings are recommended. As discussed in Impact 9-1, the barrier plantings would be incorporated along the upper elevations of the levee along the south side of WCCSL Areas B and C. Exclusionary fencing is identified in Mitigation Measure 9-1(a) for the 600-foot segment of the Phase 3 Trail north of the WCCSL as a means of preventing human access to the San Pablo Creek Marsh.
- 12-10. This comment suggests the plant list in Appendix 9A of the Draft EIR should be composed of species indigenous to the North Richmond area. See response to comment 3-3. None of the recommended species from the Planting Recommendations in Appendix 9A of the Draft EIR are considered particularly invasive or problematic other than poison oak.

- 12-11. This comment suggests measures to protect wildlife from predators may not be appropriate. Mitigation Measure 9-1(d) has been recommended in the Draft EIR based on input received from jurisdictional agencies, including the California Department of Fish and Game. Introduced red fox and feral cats are a large problem along much of the shoreline of the Bay, and high numbers of feral cats have been observed at the site.
- 12-12. This comment suggests Phase 4 of the Trail should not be eliminated and Mitigation Measure 9-4(d) is meant to control predators. See response to comment 3-2 for a detailed discussion of recommendations regarding protection of important wildlife features on the site. No additional response is necessary.
- 12-13. This comment suggests that air quality and odor impacts should be re-analyzed because the Draft EIR used incorrect estimates of traffic. See response to comment 12-1. No re-analysis is necessary.
- 12-14. This comment suggests that relying on proposed new emission standards to offset increases in traffic is not appropriate. The commenter misstates the conclusions of the Draft EIR. The analysis of diesel exhaust impacts does not rely on new emissions standards to offset increases in traffic. The risk assessment results were used to judge impacts. The reference to the statewide *Diesel Risk Reduction Plan* was intended to provide information on future trends in diesel exhaust emissions and health risks. Since the health risk assessment is based on a 70-year exposure, information on future trends provides background regarding the worst-case nature of the analysis.
- 12-15. This comment suggests that Trail closure is not an appropriate control measure to mitigate against the hazards created by spraying or spreading liquid biosolids. The reference in the comment to 50,000 tons is not appropriate regarding impacts on Trail use. As stated in the response to comment 11-5, that limit applies to the southern slope spreading and drying area, which is not near a Trail segment. Spreading of dried biosolids on the western or northern slopes would be a periodic operation, usually occurring one time during the year when the West County sludge lagoons are being annually cleaned of residue.
- 12-16. This comment suggests that the Draft EIR does not specify protections against plant pathogens within the local area and additional composting controls are necessary. Composting is an effective process for pathogen reduction and the requirements of 14 CCR §17868.3 for pathogen reduction must be met by the Applicant. The Applicant is obligated to comply with appropriate local, state, and federal requirements that relate to composting which will provide the necessary control measures. Additional restrictions on the composting process are not appropriate.
- 12-17. This comment suggests that noise impacts should be re-analyzed because the Draft EIR used incorrect estimates of traffic. See response to comment 12-1. No re-analysis is necessary.

- 12-18. This comment expresses support for the analysis of illegal dumping in the Draft EIR. No response is necessary.
- 12-19. This comment suggests the traffic analysis in the Draft EIR should include the impacts on the neighboring communities of North Richmond, Parchester Village, and west San Pablo. The focus of the Draft EIR traffic analysis on Richmond Parkway and Parr Boulevard is appropriate given that this is the approach roadway used by the great majority of Project traffic. The traffic analysis is consistent with the requirements of the County standards for conduct of traffic impact studies. No additional analysis is necessary.
- 12-20. This comment suggests that noise, air and traffic impacts should be re-analyzed because the Draft EIR used incorrect estimates of traffic. See response to comment 12-1. No re-analysis is necessary.
- 12-21. This comment suggests that noise and pollution impacts on Parchester Village be analyzed. At its nearest point, Parchester Village is located about 800 feet northwest of the Richmond Parkway. The discussion on page 12-14 of the Draft EIR is accurate for residential land uses along the Parkway. No noise impact to Parchester Village would occur.
- 12-22. This comment suggests the diesel risk assessment is limited to cancer risk and excludes asthma. Air pollution plays a well-documented role in asthma attacks; however, the role air pollution plays in initiating asthma is still under study and may involve a very complex set of interactions between indoor and outdoor environmental conditions and genetic susceptibility. Studies have shown that children who participated in several sports and lived in communities with high ozone levels were more likely to develop asthma than the same active children living in areas with less ozone pollution. Other studies have found a positive association between some volatile organic compounds and symptoms in asthmatic children. A large body of evidence has shown significant associations between measured levels of particulate matter outdoors and worsening of both asthma symptoms and acute and chronic bronchitis.

While these general relationships are known, it is not possible to perform a risk assessment for asthma. It is possible to do a health risk assessment for diesel exhaust particulate because specific rates of risk have been identified for the specific pollutant, diesel exhaust particulate. This means that statistical studies have identified a quantified risk associated with a given exposure.

In the case of asthma, no quantified relationship between exposure and health effect has been established. The problem is exacerbated by the multiple pollutants known to cause or worsen asthma. Even if a risk factor was available for ozone (the pollutant most clearly documented as causing asthma), it would not be possible to estimate a project-caused ozone increment, particularly on the local scale, since ozone is not released directly to the atmosphere, but is created in the atmosphere by photo-chemical reactions. With the current knowledge of the cause-effect relationship between pollutants and

asthma, it is not possible to conduct a quantified risk assessment for asthma in the same manner as was accomplished for diesel exhaust particulate cancer and non-cancer risks.

- 12-23. This comment suggests the Draft EIR does not study growth-inducing impacts. Chapter 14, Section C, provides a discussion of growth inducement. As discussed in that section, neither the County nor City General Plans identify provisions for additional resource recovery and disposal capacity as growth-inducing. Lower garbage costs would not seem to be a critical factor when people and businesses consider relocation.
- 12-24. This comment suggests the Draft EIR does not adequately study regional impacts. The scope of the noise, air quality, traffic, and roadway maintenance analyses in the Draft EIR is appropriate given the location of the WCCSL in an industrial area, an absence of sensitive receptors near the facility, and the availability of the Richmond Parkway for Project-related traffic which keeps most of the traffic off of neighboring city streets. The analysis of illegal dumping in the North Richmond area under Impact 4-5 is an important regional environmental justice issue. No additional regional analyses are necessary.
- 12-25. This comment suggests the Draft EIR lacks an analysis of recreational impacts. There are two significance criteria for recreational impacts in Appendix G of the CEQA Guidelines:
1. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities . . . ?
  2. Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Criterion 1 is not relevant, while criterion 2 is relevant. The Public Access Trail is a component of the proposed Project and its effects on the environment were evaluated in appropriate sections of the Draft EIR. Impact 4-2 summarizes the effects on Trail users created by other Project activities in terms of noise, odor, public health, and traffic and safety. The goal of the Trail around the landfill facility, as discussed in Appendix 3K of the Draft EIR, is to provide recreation and increased access to the Bay, and to offer a setting for wildlife viewing and environmental education. This would be done in the context of the WCCSL being an operating resource recovery and solid waste disposal facility. The analysis in the Draft EIR did not reveal any impacts to Trail users that could not be mitigated to less-than-significant levels. In view that there is tremendous support for the Trail as evidenced by other commenting agencies and organizations in this Response Document, there is no basis that Trail users would be discouraged from using the Trail.

- 12-26. This comment suggests the Applicant could relinquish their permit for the Central IRRF in exchange for obtaining a permit for transfer operations at the landfill. The operator for the Central IRRF is West County Resource Recovery, Inc., which is a separate and distinct entity from the Applicant.

- 12-27. This comment suggests the EIR fails to consider a reasonable range of alternatives. See response to comment 8-4. In addition, it is the goal of the Applicant to maximize resource recovery and recycling opportunities consistent with the requirements of the California Integrated Waste Management Act. There is no requirement that the service area of the WCCSL has to be restricted to a certain geographical area. Revenue-generating activities are important in order to operate such a facility cost effectively. Smaller operations and more fees would be counter-productive to these goals and objectives.
- 12-28. This comment suggests the Draft EIR include an alternative in which biosolids treatment is limited to sludge generated by the WCWD. See response to comments 8-2, 8-22, 11-5, and 12-27.
- 12-29. This comment correctly points out that the WCCSL site spans both the City of Richmond and unincorporated County area. It incorrectly assumes that confusion and conflict is inevitable regarding the administration of mitigation fees and surcharges. Land use decisions are made by the agencies in the jurisdiction in which the use occurs. In this case, both the City of Richmond and County have successfully administered their respective permits for the WCCSL BMPC. Similarly, administration of applicable fees or surcharges also has been successfully implemented.



November 23, 2003

73 Belvedere Ave.  
 Richmond, CA 94801  
 Phone/Fax: 510-235-2835  
 Email: tracbaytrail@earthlink.net

Ms. Deidra Dingman  
 Solid Waste Program Manager  
 Community Development Dept.  
 Contra Costa County Administration Building  
 651 Pine St., 4th Floor, North Wing  
 Martinez, CA 94553-0095

Dear Deidra,

TRAC, the Trails for Richmond Action Committee, has several comments on Bay Trail aspects of the November 2003 Draft EIR for the WCCSL Bulk Materials Processing Center and Related Actions.

The key Bay Trail issues are:

1. The Phase I trail should include the 0.5-mile spur from the SW corner of the landfill levee system to the southern breach in the outer levee
2. There is no evidence that significant environmental effects would result from a trail on the outer levee segment currently isolated by breaches and, hence, no justification for recommending deletion of the Phase 4 Bay Trail route, which is specified in the North Richmond Shoreline Specific Plan, because:
  - a. no data are presented on the species or numbers of birds, if any, which use this isolated section of the outer levee and
  - b. the two-year Wildlife and Public Access Study by Trulio and Sokale found no evidence that human use of levee trails affects bird abundance or diversity in foraging habitats at three locations where mud flats are exposed at low tide.
3. Poison oak and blackberry should be deleted from the trail side plant list.

### **Phase 1 Trail Definition**

The broad, diverse WCCSL Bay Trail Loop Committee comprised of ABAG, BCDC, City of Richmond, Contra Costa County, Neighborhood House of North



Richmond, Save The Bay, Sierra Club, TRAC, Jay Vincent, WCCSL and others worked during 2000-2002 to develop a public access plan which WCCSL is willing to carry out. This plan calls for opening a scenic Bay Trail loop around the landfill in phases as described in the February 2002 WCCSL Shoreline Public Access Trail Development Plan, which was endorsed by the Bay Trail Loop Committee on March 4, 2002.

The April 2003 trail plan presented in DEIR Appendix 3K appears to be generally the same as the February 2002 plan. Section 5.1 of the trail plan in Appendix 3K correctly defines the Phase 1 trail to include a 0.5-mile spur leading from the SW corner of the landfill to a gap in the levee and states "Extending the spur trail beyond the gap is a part of a possible Phase 4". **However, Figure 3-7 on page 3-39 incorrectly shows this Phase 1 spur as part of Phase 4.**

13-1

The WCCSL Bay Trail Loop Committee's recommended that the 0.5-mile trail spur to the southern breach in the levee should be included in Phase 1. It should not be reclassified as Phase 4. This spur has fine vistas and provides an excellent opportunity for recreational and educational viewing of wading birds which forage in mud flats. (See summary below of Trulio and Sokale study.)

#### **Phase 4 Trail on Isolated Section of Levee**

The North Richmond Shoreline Specific Plan calls for a multi-use trail around the outer levee of the landfill, including the section isolated by breaches (Specific Plan Figure 7 Public Access and Recreation). Contrary to the Specific Plan, the DEIR recommends deletion of the Phase 4 trail (pages 2-11, 9-3, 11, 13 & 15-19 and 13-46). As discussed below, there is no basis for concluding that the Phase 4 trail would have significant adverse environmental effects.

DEIR Section E.4., Preferred Environmental Alternatives, on page 13-46 states: "Chapter 9 recommended Mitigation Measure 9-4(a) to eliminate Phase 4 because the levee provides important resting, roosting and nesting habitat for birds. Section A.1.a. on page 9-3 goes on to state: "A resource of particular importance to birds is the *isolated levee segment* along the northwestern edge of Area C. Because this levee has been breached in two locations, human access to the *isolated portion* requires a boat, which contributes to its sensitivity and importance as resting, roosting, and nesting substrate for numerous birds." **However, the DEIR contains no evidence that birds of any species use the isolated section of the levee for resting, roosting or nesting.** Absent such evidence, there is no basis for eliminating this trail, which is specified in the North Richmond Shoreline Specific Plan.

13-2

Furthermore, there is no support for the DEIR's statement that "Human access associated with the Phase 4 alignment would greatly diminish and possibly eliminate the use of this area by many species" (Section E.4, page 13-46). Preliminary results

of the two-year Wildlife and Public Access Study by Trulio and Sokale (Reference 98, DEIR page 9-19) found no relationship between human use of trails and bird abundance or diversity in foraging habitats at three locations in the Bay Area. This study was funded by ABAG, BCDC, California Coastal Conservancy, East Bay Regional Park District, Mid Peninsula Open Space District, National Park Service and others. At each of the three locations studied, bird abundance and diversity was evaluated in a tidal wetland where mud flat is exposed at low tide, comparing an adjacent Bay Trail site on a man-made levee with a control site having no trail within one half mile. The WCCSL EIR should rely upon the Trulio and Sokale study since it is ideally designed for evaluating the effect on birds of trail use on the WCCSL levee system.

13-3

The DEIR also suggests that bridges over the levee breaches might require bay fill which would have adverse environmental effects. This could be avoided easily by use of clear span bridges, which do not require fill, as Audubon has done at their preserve on Tomales Bay.

13-4

In conclusion, absent evidence that threatened or endangered species nest on the isolated section of the levee, there is no basis for concluding that the Phase 4 trail would have significant environmental effects. If there were such effects, mitigation measures should be evaluated rather than simply overturning the North Richmond Shoreline Specific Plan.

13-5

### **Bayside Trail Planting**

The DEIR calls for installing a “tough, prickly barrier” of plants along about one mile of trail “to control the spread of invasive exotics and to establish a protective buffer of native vegetation between the proposed trails alignment and adjacent marsh and open water habitats” (Impact 9-1 on pages 2-26 & 9-11). “The barrier plantings would be installed along the upper elevations of the levee along the south side of Areas B and C to discourage any access into the adjacent marsh and mud flats at low tide” (page 9-11). Unfortunately, the plant list of Appendix 3K includes hostile, invasive native plants such as California blackberry and poison oak.

First, a barrier planting is unnecessary because very few people would be inclined to wade into mud flats where they would become mired down. Second, preliminary results of the two-year Wildlife and Public Access Study by Trulio and Sokale (Reference 98, DEIR page 9-19) found that human use of levee trails **with “little or no buffer vegetation”** had no effect on bird abundance or diversity in tidal wetland foraging habitats, which included mud flats, at three locations in the Bay Area. Hence, barrier planting is not needed from the standpoint of foraging birds.

13-6

Although not necessary to protect foraging birds, many of the plant species listed in Appendix 3K Bayside Trail Planting Recommendations could enhance the levee

environment both for wildlife and trail users. However the proposal for planting a barrier of poison oak and California blackberry is unnecessary and ill advised. Such a barrier would interfere with bird watching and nature education opportunities along the trail and also create serious ongoing management problems to control these invasive plants.

13-7

Children and many adults do not recognize poison oak, especially when it is dormant and leafless. Furthermore, some children and adults are acutely allergic to the toxins contained in poison oak and would require treatment with corticosteroids. The trail will soon require application of herbicides to control invasion of both blackberry and poison oak. Herbicides may adversely affect the wetland ecosystem.

I hope that these comments are helpful. Please let me know if you would like clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Beyaert", with a long horizontal flourish extending to the right.

Bruce Beyaert, TRAC Chair

**LETTER  
#13  
RESPONSE**

Trails for Richmond Action Committee  
Bruce Beyaert, Chair  
November 23, 2003

---

- 13-1. This comment correctly notes that Figure 3-7 incorrectly shows the Phase 1 spur as part of Phase 4. This error has been corrected and the revised figure is included in Chapter 4 of this Responses to Comments Document.
- 13-2. This comment suggests there is no evidence supporting the EIR recommendation of deleting Phase 4 of the Trail alignment. See response to comment 3-2 for a detailed discussion of recommendations regarding protection of important wildlife features on the site.
- 13-3. This comment suggests the EIR should rely on the Wildlife and Public Access Study by Trulio and Sokale. See response to comment 3-2 for a detailed discussion of recommendations regarding protection of important wildlife habitat features on the site.
- 13-4. This comment suggests that clear span bridges be used on the Phase 4 alignment. As discussed on pages 9-13 and 9-14 of the Draft EIR, construction of the Phase 4 improvements would require crossing the two breaches in the outer levee. Details on the proposed design are not available, but it is likely that fill will be required to increase the top of the levee to protect this segment from erosion, or to install supports for the new bridge crossing. The northern crossing would span a breach over 100 feet in length, and could require mid-span supports or other engineering solutions beyond a simple clear span. Any modifications to the shoreline and open waters of San Pablo Bay must be coordinated with the U. S. Army Corps of Engineers and BCDC, as called for in Mitigation Measure 9-3. See response to comment 3-2 for a detailed discussion of recommendations regarding protection of important wildlife habitat features on the site, including avoidance of the isolated levee segment.
- 13-5. This comment suggests that there is no basis for concluding the Phase 4 Trail alignment would have significant environmental effects. See response to comment 3-2 for a detailed discussion of recommendations regarding protection of important wildlife features on the site.
- 13-6. This comment suggests barrier plantings are not necessary. See response to comment 3-3 for information on appropriate Trail plantings, and revisions to the Planting Recommendations contained in Appendix 9A of the Draft EIR.
- 13-7. This comment suggests barrier plantings of poison oak and California blackberry is ill advised. The commenter is referred to page 9-11 of the Draft EIR. See response to comment 3-3 for a review of the appropriateness of proposed plantings along the shoreline Trail. None of the recommended species from the Planting Recommendations in Appendix 9A of the Draft EIR are considered particularly invasive or problematic other than the poison oak.



December 22, 2003

73 Belvedere Ave.  
 Richmond, CA 94801  
 Phone/Fax: 510-235-2835  
 Email: tracbaytrail@earthlink.net

**FAX To:**

Ms. Deidra Dingman  
 Solid Waste Program Manager  
 Community Development Dept.  
 Contra Costa County Administration Building  
 651 Pine St., 4th Floor, North Wing  
 Martinez, CA 94553-0095

Dear Deidra,

TRAC, the Trails for Richmond Action Committee, would like to supplement its November 23 letter to you commenting on Bay Trail aspects of the November 2003 Draft EIR for the WCCSL Bulk Materials Processing Center and Related Actions.

This letter covers the following additional Bay Trail issues:

1. TRAC agrees with the concerns expressed in the December 18 letter from Debbi Landshoff of the Sierra Club about closure of the Bay Trail and pedestrian safety and
2. Bridges should be built across the levee gaps for compliance with public access provisions of City and County permits issued in 1992-1994 and for completion of the trail as specified in the North Richmond Shoreline Specific Plan.

**Impact 8-5 (pages 8-21 & 8-22)**

For enhanced safety, TRAC suggests that a pedestrian and bicyclist manually-activated stop light be considered at the Bay Trail crossing on each side of the main roadway leading to the scale house.

14-1

**Impact 11-7 (pages 11-30 to 11-32)**

TRAC agrees completely with the Sierra Club that it would be unacceptable to close

the Bay Trail for four to six week periods as proposed by the applicant under Impact 11-7 and in Mitigation Measure 11-7(c). Other mitigation measures should be employed if necessary, e.g. ensuring that that biosolids applications do not take place in proximity to the Bay Trail. 14-2

This multi-purpose trail is specified in the North Richmond Shoreline Specific Plan. The proposed biosolid spreading operations would create unacceptable adverse recreational impacts and adversely affect people if they are in conflict with the Specific Plan plan by being incompatible with use of the Bay Trail. This conflict would cause "an adverse effect on people" (CEQA Guidelines Sect.15382) because the project would foreclose use of the Bay Trail and related shoreline access opportunities to the citizens of Richmond and the rest of Bay Area. Section 15382 of the CEQA Guidelines defining "Significant Effect on the Environment" states "A social or economic change related to a physical change may be considered in determining whether the physical change is significant".

#### **Phase 4 Bridges Should Be Included**

**The North Richmond Shoreline Specific Plan calls for a multipurpose pedestrian and bicycling trail around the landfill, including on the outer western levee.** However, page 3-41 of the DEIR dismisses the completion of this Phase 4 trail because the required two pedestrian bridges "would be expensive and more complicated from a permitting standpoint." The planned trail should not be dismissed on the basis of cost or "complicated" permitting. 14-3

The DEIR contains no information on the claimed "expensive" cost of the required two bridges. A recent report by Questa Engineering Corp for East Bay Regional Park District estimated that a 60-foot long, ten-foot wide steel precast clear span bridge (both abutments located at top of a bank without any construction in the Bay) would cost \$90,000 installed. The levee gaps are about 25 feet wide on the south and 100 feet wide on the north, and an eight-foot wide bridge would be adequate for the landfill situation. Hence, the two bridges probably would cost less than \$200K. However, cost is not a justification for the County or City to eliminate the Phase 4 trail. The North Richmond Shoreline Specific Plan (Section 7.F.3.f., pages 121-122) states: "... open space and recreation facilities would be financed by the landfill operators.."

The Conditions of Approval for Contra Costa County Land Use Permits 2054-92 & 2043-94 for the Landfill (Condition 21.5 Transportation and Circulation Plan Public Access) clearly state:

"By July 1, 1995 a plan with a related schedule shall be developed for public access around the **entire site boundary** (emphasis added) and submitted for approval and review as the above plan. However, the City of Richmond will be lead agency and have specific approval over that portion of the public access within their jurisdiction." **"The plans for public access shall implement the public access**

**policies of both agencies** (emphasis added) ...”.

Hence, current land use permits for the landfill call for completion of the entire Phase 4 trail because:

- a. it is necessary to encompass the “entire site boundary” as required by current land use permits for the landfill and
- b. it is necessary to comply with the “public access policies” of the North Richmond Shoreline Specific Plan calling for a multipurpose trail around the western levee of the landfill.

14-4

I hope that these comments are helpful. Please let me know if you would like clarification.

Sincerely,



Bruce Beyaert, TRAC Chair

cc: Debbi Landshoff  
Janet McBride  
Morty Prisament  
Laura Thompson

**LETTER**  
**#14**  
**RESPONSE**

Trails for Richmond Action Committee  
Bruce Beyaert, Chair  
December 22, 2003

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- 14-1. This comment suggests a manually activated stop light be considered at the Bay Trail crossing of the landfill access road. See response to comment 12-6.
- 14-2. This comment suggests that it is unacceptable to close the Trail due to biosolids applications. See response to comment 12-15.
- 14-3. This comment suggests that the Phase 4 Trail alignment should not be dismissed because of the cost and permitting requirements of the two required pedestrian bridges. The discussion on page 3-41 of the Draft EIR relating to the cost of and permitting requirements associated with the pedestrian bridges have been long-standing issues associated with Phase 4. These considerations, however, were not considered in Mitigation Measure 9-4(a) which is based on wildlife and habitat disruption. Also, see response to comment 3-4.
- 14-4. This comment suggests that current land use permits and the North Richmond Shoreline Specific Plan call for completion of the Phase 4 Trail. See response to comment 3-2.



**WEST COUNTY TOXICS COALITION**  
 1019 Macdonald Ave., Richmond, CA 94801 415-232-3427

**Community Development Department**  
**Deidra Dingman, Solid Waste Program Manager**

03 DEC -8 AM 10:14

**December 2, 2003**

**The following coments are submitted on behalf of the West County Toxics Coalition in regard to the DEIR for the WCCSL Bulk materials Processing and Relation Actions.**

**On page 13-2 of the Draft Environmental Impact Report, under B.**

**No- project Alternative where it talks about the Central IRRF, Intergrated Resource Recovery Facility. Whereas this facility has already been approved in the former environmental impact report at the Pittsburg Avenue location, the fact of the matter now is that the North Richmond community and specifically the West County Toxics Coalition do not support the expanded operation of the IRRF at 101 Pittsburg Avenue site. It would be less impact on the North Richmond community in terms of odors, rodents, and truck traffic if the IRRF was not expanded at the 101 Pittsburg site, but any additional capacity be at the landfill site.**

15-1

**On page 4-10 under \*Odor, it mentions odors being spelt by Trail users, and that a liquid biosolids spreading demonstration project would be conducted before full application .**

**The questions are :**

**1. How will residents know the results of the demonstration project? Will there be an updated or supplemental environmental impact report?**

15-2

**2. The biosolids discussion does not address micro-organisms.**

15-3

**On page 4-20 -4-23 Mitigation Measure 4-5 it makes reference to the mitigation fee being controled by the City and County. The North Richmond Municipal Advisory Council should be included. There have been too many problems already with the County not communicating with the NRMAC on expenditures and the amount in the fund.**

15-4

**Thank you for considering these comments.**

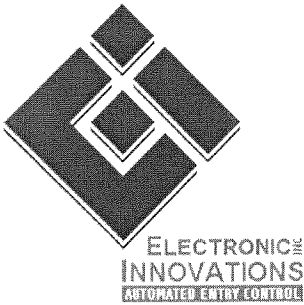
*Sincerely*  
*Dr. Henry Clark*

**LETTER  
#15  
RESPONSE**

West County Toxics Coalition  
Dr. Henry Clark  
December 2, 2003

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- 15-1. This comment expresses support for the Project and not expanding the Central IRRF. No response is necessary.
- 15-2. This comment questions how the results of the liquid biosolids spreading demonstration project will be known to local residents. In order to research the potentially significant impact(s) to the environment, if any, and the feasibility of implementing the biosolids spreading project on a permanent basis, it was recommended in the Draft EIR that the project initially be a demonstration. When it has been determined that the project will be expanded (continued after the demonstration project is completed), the project should undergo the permitting and approval process in order to become a permanent activity. During the permitting process, the Lead Agency will use the results from the demonstration and compare them to the analysis, conclusions, and mitigation measures of this EIR. If required, a supplemental CEQA document, with public notification and review, would be prepared. As preparation of a supplemental CEQA document is an uncertainty, the commenter is encouraged to maintain regular contact with the Local Enforcement Agency (see comment letter 7) to monitor the status of the demonstration project and availability of results.
- 15-3. This comment suggests that biosolids discussion in the Draft EIR does not address microorganisms. The commenter is referred to Impact 11-7 on page 11-30 of the Draft EIR which focuses on the health and safety aspects of biosolids application.
- 15-4. This comment expresses a personal opinion that the North Richmond Municipal Advisory Council (NRMAC) should be included in the administration of mitigation fees in addition to the City of Richmond and County. This comment does not specifically address the analysis or conclusions in the EIR. No response is required.



21 December 23, 2003

Parr  
Boulevard  
RICHMOND  
CALIFORNIA  
94801  
FACSIMILE:  
510.232.3205  
TELEPHONE:  
510.233.2795

Contra Costa County  
Community Development Department  
651 Pine St., 4<sup>th</sup> Floor N. Wing  
Martinez, CA 94553  
Attn: Deidra Dingman

RE: Proposed Amendment of Land Use Permit  
(LP #022026) for Bulk Materials Processing Center  
and Related Actions at the West Contra Costa  
Sanitary Landfill

This letter is in response to the proposed landfill use permit modifications and to express our opposition to the expansion or modification of the Sanitary Landfill land use permit.

When we purchased 21 and 45 Parr Blvd. in 1988 we were told the landfill would close in 2 to 4 years once it was filled. The landfill has stayed open longer, probably due to recycling programs, but now it is full and we want it closed as previously promised and planned.

The specific reasons, we do not support the continued operation of the landfill is as follows:

1) Roadway Dirt- Parr Blvd is covered in dust and dirt from the landfill road and operations. This dirt is on the roads, which turns to mud. You can see the effects on the Richmond Parkway around the Parr Blvd. intersection. Recently public works crews were cleaning this up so the issue has been mitigated, but the cause still exists. You can drive the Richmond Parkway and see the deposited dirt and mud in the roadway gutters.

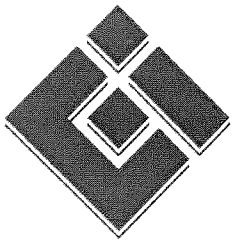
16-1

2) Storm Water Pollution- The dirt and dust stay on the roads until the rains and this flows into the storm drain system. This dirty/dusty water flows into the creeks and bay depositing the soils, some of which must contain pollutants. In addition, several years ago, the County made a big push on dirt and dust getting into our storm water. Is this no longer an issue?

16-2

3) Dust and Airborne Pollution- The landfill is the only unpaved facility around our operations. We have a dust problem in and around our building. I have enclosed photos of our warehouse mezzanine showing the dust on the handrail. Another photo shows the dust from the exhaust fans in our restrooms. We continuously clean during the summer months to reduce dust and dirt contamination.

16-3



Contra Costa County  
Community Development Department

December 23, 2003

Page 2

4) Traffic- We have hundreds of vehicles that drive in front of our building going to the landfill. We have had situations where we could not safely exit due to vehicles speeding. In addition, several times each year, the landfill opens late so traffic backs up along Parr Blvd. and stops our employees from entering our driveway and our company vehicles can't exit due to our driveway being blocked with trucks waiting for the gates to open.

16-4

5) Trash and Dumping- Parr Blvd. has turned into a dumping ground of trash, vehicles, and other materials. Some of this trash blows off the vehicles due to tarps not being used. Others come from people illegally dumping because the landfill is closed.

16-5

6) Abandoned vehicles- The County has received numerous calls from me due to the abandonment of vehicles on Parr Blvd. I believe the landfill is the cause because they believe someone else will clean it up. We constantly have vehicles left on the roadway broken down filled with trash. Attached is a recent photo taken December 19, 2003. This vehicle has been here 4 days. The County just cleaned this up. The week before another vehicle was left, which were shown to County Supervisor John Gioia and Sheriff's Department staff Under Sheriff Ron Jarrell and Lt. Juroid De Vaull at a meeting at my office.

16-6

In closing, the landfill is not a good neighbor. They do nothing to help clean the area up and help deal with the previously mentioned issues.

In addition, our tenant, the Hertz Corporation has also complained to me about all the dust, dirt and garbage in the area. They sometimes must re-wash a piece of equipment, so it's clean before it goes out on rent, even though they wash it when it's returned from its previous rental.

I am concerned Hertz may not continue to lease their space if these issues are not resolved.

Again for the above reasons, we hope this permit is not approved.

Very truly yours,

**ELECTRONIC INNOVATIONS, INC.**

Eric Bledsoe  
President







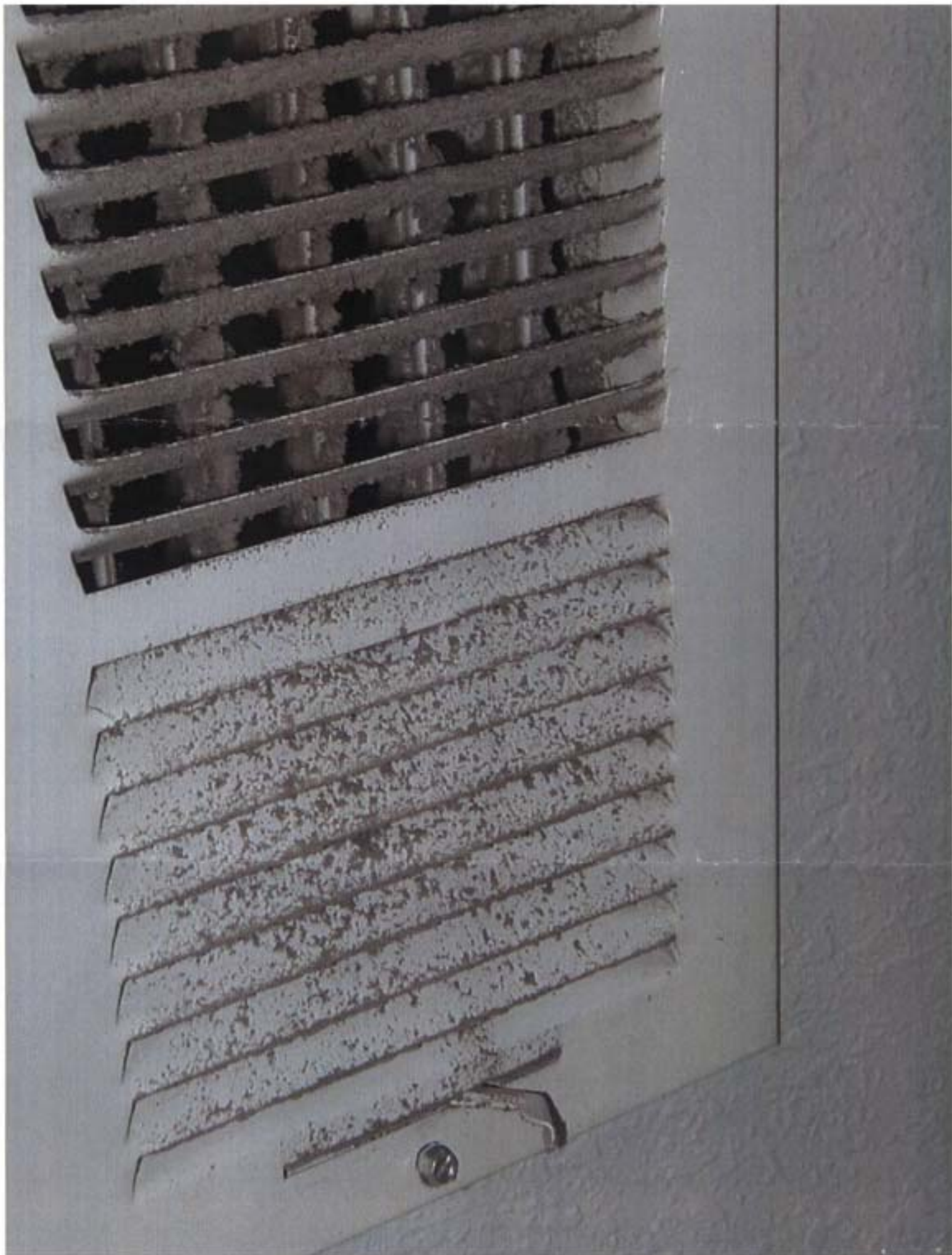














EXIT



**LETTER**  
**#16**  
**RESPONSE**

Electronic Innovations  
Eric Bledsoe, President  
December 23, 2003

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- 16-1. This comment suggests that Parr Boulevard is covered with dust and dirt due to landfill operations. According to the Applicant, the dirt track out from the landfill operations is being more aggressively managed by the landfill personnel. After the landfill closes, the active face area, which is the source of most of the tracked out material, will no longer exist. The BMPC traffic will travel on gravel or paved roadways, and the dirt and dust should be significantly reduced.
- 16-2. This comment suggests that storm water pollution from Parr Boulevard affects local creeks and the Bay. Storm water control is still very important to the environmental protection agencies. Reduction in the mud and soil trackout with the BMPC operations should reduce this impact.
- 16-3. This comment suggests the landfill causes dust problems in and around the commenter's building. This is a personal opinion by the commenter. No response is required.
- 16-4. This comment suggests the landfill causes traffic and safety problems on Parr Boulevard. This is a personal opinion by the commenter. No response is required.
- 16-5. This comment suggests the landfill causes littering and dumping on Parr Boulevard. This is a personal opinion by the commenter. No response is required.
- 16-6. This comment identifies abandoned vehicles as a problem, and the personal opinion that the WCCSL landfill operation is the cause of the problem. This comment does not address the analysis or conclusions of the EIR. The problem of abandoned vehicles occurs in North Richmond and other locations throughout the County and is not exclusive to locations in proximity to solid waste facilities. The problem of abandoned vehicles is more likely due to socio-economic issues, than to location of the WCCSL landfill.

**--- West Contra Costa Sanitary Landfill, Inc. ---**  
**MEMORANDUM**

3260 Blume Drive, Suite 200 Richmond, CA 94806

Phone (510) 262-1660

Fax Phone (510) 262-1656

e-mail address: burchl@reprsvwest.com

December 22, 2003

To: Deidra Dingman

From: Larry Burch

**Subject: COMMENTS ON DRAFT EIR**

The following are our comments derived reviewing the Draft EIR for the WCL Bulk Materials Processing Center and Related Actions.

**COMMENTS**

- The Public Access Trail opening date given on Pg 2-4 & Pg 3-42 of the DEIR and Pg 13 of Appendix 3K as December 1, 2003 turned out to not be practical since the permits are still in progress. It appears that the opening date will be spring 2004. 17-1
- The possible PM<sub>10</sub> emissions exceedance issue listed on Pg 2-7 indicates the possible action of deleting an entire operation to reduce the emissions. We suggest another alternative should be listed instead – downsizing the operation to be within the emissions limit when the appropriate emission control equipment and measures are implemented (e.g. smaller composting & concrete crushing operations). The sizing of the facilities probably will be determined by the Permits issued by the BAAQMD. Downsizing may not be necessary. 17-2
- Pg 2-9 & Pg 3-35 contain references to the landfill site life expiring in October 2003 if the Soil Stockpile Building remains in place. Excavation of the landfill final cover found greater than anticipated settlement (creating more disposal space) and waste burial operations have achieved higher rates of compaction. The expected date with the building still in place now is May 2004. Note that the reference to Table 3-5 in Chapter 3 should be to Table 3-6. The dates in the table will be updated in our reports due to the RWQCB and County LEA in January 2004. 17-3
- Pg 2-15 contains a summary of Mitigation Measure 4-5. This subject is also described on Pg 4-23. If approved, we must conduct an investigation of reports of illegal dumping within 24 hrs, and if the incident is verified, the dumped materials must be removed within 24 hrs after verification (removal within 48 hours of



- reporting). This appears to be a very tight schedule for incidents reported where the weekend occurs within the 48 period, and would require overtime work for removal on a Holiday weekend. We request that the period be reasonably extended. We would like the County staff to have administrative leeway in setting the time periods. 17-4
- Pg 2-28 & Pg 9-15 – Impact 9-3: Our discussions with the Save-the-Bay Association representatives regarding the outer levee serving as a launch site for the Kids in Canoes Program centered on a type of launching float that would be simple and environmentally friendly. Ramps or floats used at other bayside locations would provide guidance on the type of facility to be provided. Corps and BCDC authorizations would be obtained. Actually, as part of the Public Access Trail Plan cooperative action with other interested entities, we hope that all agencies and entities can work together mutually to create this new recreational and educational resource. 17-5
  - Pg 2-30 & Pg 10-18 – Mitigation Measure 10-1 (f) indicates the exposed stockpile dust control program should include twice daily watering. Experience at the WCCSL indicates that with the amount of clay and silt in the local soils, once the pile exterior has been wetted with water, it forms a hardened crust, thus preventing dust occurrence. Multiple watering daily is not necessary, and watering should be done as needed to control dust. 17-6
  - Pg 2-31 and Pg 10-19 indicate the applicant-proposed control of paving the roads, unloading areas and the processing area of the “WRC”. It should be noted that the WRC includes both the mixed waste handling area and the organics processing area. We plan to provide such paving at the mixed waste handling area (the recycling and transfer station). Due to being located on the top of the landfill, no paving is planned at organics processing facility. Over time after the majority of the initial landfill settlement has occurred, some areas of the organics receiving and processing facility may be paved. 17-7
  - Pg 2-31, Pg 2-45 (b), Pg 10-19 & Pg 11-29 – Watering of green materials as they are being unloaded is not necessary. These materials are not normally sources of dust during unloading. The surfaces of the unloading areas are routinely sprayed with water during the dry weather. The materials periodically are watered during the dry weather prior to grinding, to avoid dust production during the grinding operation. 17-8
  - Pg 2-34 & Pg 10-27 reference a proposed 1-year composting demonstration project as Mitigation Measure 10-5. The odor-monitoring program could involve relatively intensive observations by an odor panel. We request the opportunity to help design the program with the regulatory agencies and develop a protocol for use of the odor panel, including the identification of the points where monitoring will be conducted. We agree that the multi-materials composting program does need to be well operated to assure no odor nuisances are created. 17-9
  - Pg 2-36 – The OIMP was not developed to govern the WRC mixed waste area. It applies to the organics processing area of the WRC and the composting operation. 17-10
  - Impact 11-2 on Pg 2-42 & Pg 11-20 references the location of the hazardous materials site (HWMF) and we concur that the potential impact on the project is less than significant. This is consistent with the findings of the 2000 EIR prepared by the 17-11

DTSC for the HWMF. During the closure process between 2000 and 2003, the HWMF was fully capped and will be permanently fenced in 2004. No access by the public will be allowed under the Postclosure Permit issued in August 2003 by DTSC.

- Pg 2-42 & Pg 11-21 includes Impact 11-3 regarding control of diesel spills and other chemicals during project construction and operation. The Applicant-proposed control measures should have included the fact that our contract agreements with builders and tenant operators contain such control measures. We have planned that the new operations where pollutant substances could be released in rainfall runoff will be governed by specific mention in the SWPPP. As we update the various reports needed for the permits we will include this mitigation measure (i.e. reports for the WRC, composting, waste solidification). 17-12
- Impact 4-2 on Pg 4-13 covers the subject of the WRC being adjacent to the proposed Public Access Trail. We concur that this does not create any significant environmental impacts. Experience has been gained at the Central IRRF regarding co-existence of that industrial processing operation and the Wildcat Creek Public Access Trail. Along the south property line of the Central IRRF a soil berm was erected, and a fence was placed on top of the berm. This location is next to the trail. Since the Central IRRF is adjacent to homes, the fence was added to serve as an additional noise barrier. This experience will be used to guide the design of the WRC if developed at the Area A site. Along the two sides of Area A facing the trail, a soil berm would be placed 8 feet high. Thus, this will provide a noise barrier and visual screen to persons walking on the trail. A security fence will also be placed on the berm. The fence will be covered with vegetation, or visibility-screening material will be attached. It is fortunate that the Central IRRF/Wildcat Trail co-location venue, yet unrelated functions have successfully provided a real example and precedent in the West County area to follow. 17-13
- Pg 4-20 & Pg 4-23 reference the Mitigation Fee under Mitigation Measure 4-5 as being “consistent with the existing mitigation fee collected at the Central IRRF”. We presume that this means that the landfill operation will not be governed by this measure while it remains in active operation. And, within our project, the fees will be applied to only the MSW materials received at the WRC mixed waste processing facility. The fee would not be levied on the compostibles, wood wastes, concrete and asphalt debris, waste soil, solidified materials, dredged materials, and biosolids. Such an application of the fee on these materials would be counterproductive in expanding waste diversion and recycling. 17-14
- Pg 5-10 & Pg 6-4 – The reference to pumping the Class II site leachate to the sludge lagoons is incorrect. The leachate will be pumped into a new pipeline system that will allow the Class II leachate (but not HWMF leachate) to be transported to the City of Richmond Wastewater Treatment Facility (WWTF) through the existing sludge transport pipeline when the pipeline is not in use for sludge disposal from the Richmond plant. These are facilities requested and financed by the East Bay Municipal Utilities District (EBMUD). 17-15
- Pg 5-10, Pg 6-4 & Pg 6-13 The Class II leachate technically will not be “directly” pumped to the City of Richmond WWTF. Through the agreements in place with the 17-16

WCWD and the City, the leachate will be pumped to WCWD, which in turn will send it on to the Richmond plant. The WCWD is the discharger of the leachate to the City WWTF.

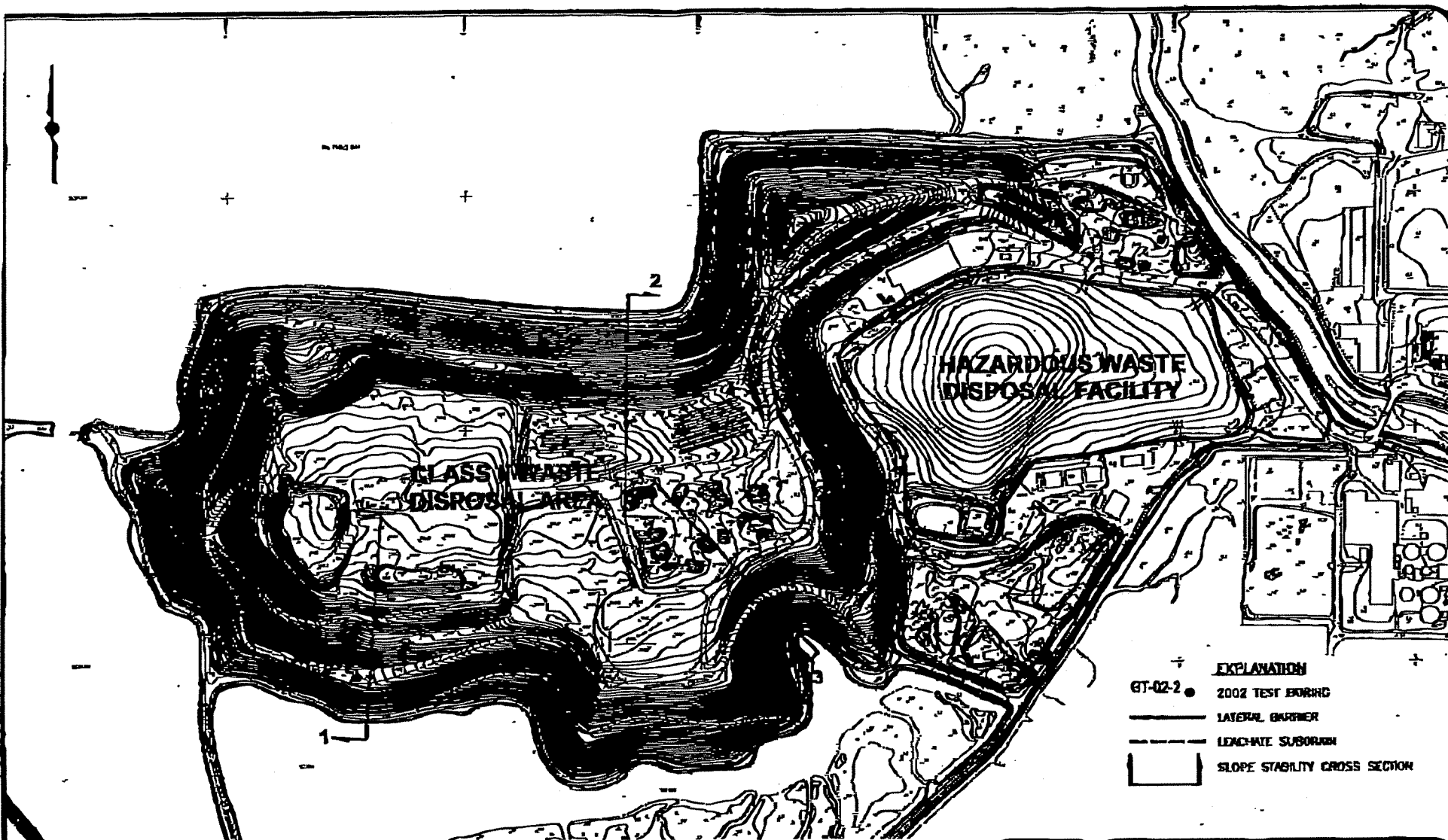
- Pg 5-17 – The further study of liquefaction was postponed until 2004 while awaiting the RWQCB review of the documents submitted by WCCSL, Inc. during 2003. 17-17
- Pg 12-5 & Pg 12-11 – The landfill gas-fired power plant noise adjacent to the trail will be reduced after a 8 foot high security/visual barrier berm is in place. 17-18
- Appendix 3H Biosolids Management Plan Summary – Discussions with the WCWD staff indicate a number of changes should be made in this Appendix. We will provide an update and provide it to the County staff. The subjects of the recommended changes include: (A) indicating that the analysis in the appendix of spreading liquid sludge on the landfill slopes was based upon handling only the WCWD sludge. The existing drying lagoons annually handle another almost equal amount of sludge from the Richmond WWTF. (B) The concept of returning the runoff water to the WCWD plant needs further study. Currently the incident rainfall on the lagoons is gravity drained (not pumped) into the WWTF, and it may be a smaller volume of water than will be generated off of the spreading area slopes of the landfill. (C) Also, the handling of the slope water generally will need to be done during and after a major storm event, which could cause operational difficulties at the WWTF, which also would be coping with added wastewater inflow from the sewerage system at that same time. (D) The slope spreading of liquid sludge was indicated in the appendix as involving several weeks between subsequent applications. With the volume of sludge produced during the dry weather season, much shorter times may exist between applications, thus shortening the drying time for the previously applied materials. (E) The discussions have pointed out the limited practicality of the liquid sludge applications on the landfill slopes in satisfying the goal of reducing the WWTF dependence on the drying lagoons. 17-19

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This completes our comments on the draft EIR. We believe that the document is quite factual regarding our proposed project and is thorough and well prepared. If you have questions concerning our comments please contact me at (510) 262-1662.

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- EXPLANATION**
- GT-02-2 2002 TEST BORING
  - LATERAL BARRIER
  - - - - LEACHATE SUBURMIN
  - ▭ SLOPE STABILITY CROSS SECTION

**Shaw** EMCONOWT, Inc.

Topographic base compiled using photogrammetric methods by Cartwright. Date of photography: May 31, 2002.

**SCALE**  
0 400 800 FEET

DATE: JUNE 2002  
QMW: EAB  
APP: \_\_\_\_\_  
REV: \_\_\_\_\_  
PROJECT NO.  
20384-001.XXX

**FIGURE 2**  
**WEST COUNTY LANDFILL, INC.**  
**WEST CONTRA COSTA SANITARY LANDFILL**  
**RICHMOND, CALIFORNIA**  
**LOCATIONS OF TEST BORINGS AND**  
**SLOPE STABILITY CROSS SECTIONS**

**LETTER**  
**#17**  
**RESPONSE**

West Contra Costa Sanitary Landfill, Inc.  
Larry Burch  
December 22, 2003

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- 17-1. This comment updates the Trail opening date from December 1, 2003, to spring 2004. Changes in the appropriate Draft EIR text are included in Chapter 4 of this Responses to Comments Document.
- 17-2. This comment suggests a Project downsizing may be necessary to meet PM<sub>10</sub> emission requirements which will be addressed by the BAAQMD. No response is necessary.
- 17-3. This comment updates landfill site life with the Soil Remediation Building, still in place, and a typographical error is also noted. Changes in the appropriate Draft EIR text are included in Chapter 4 of this Responses to Comments Document.
- 17-4. This comment requests a revision of Mitigation Measure 4-5 by extending the time allowed for cleanup of illegally dumped materials. This revision is included in Chapter 2 and Chapter 4 of this Responses to Comments Document.
- 17-5. This comment suggests that the launch site for the Kids in Canoes Program would be environmentally friendly and would be developed in cooperation with interested entities. No response is required.
- 17-6. This comment requests that Mitigation Measure 10-1(f) involving watering of exposed soil stockpiles be modified from twice daily to as needed to control dust. It is agreed that watering can be reduced if a hardened crust is maintained. Refinements to this mitigation measure are made in Chapter 2 and the appropriate Draft EIR text in Chapter 4 of this Responses to Comments Document.
- 17-7. This comment clarifies that Control Measure 10-2(c) applies only to the WRC mixed waste processing area. This clarification is made in the appropriate Draft EIR text in Chapter 4 of this Responses to Comments Document.
- 17-8. This comment suggests that Control Measure 10-2(g) involving watering of green materials during unloading is not necessary as the materials are not a source of dust, but watering of the unloading areas and green materials would continue during the dry weather prior to grinding. These refinements are acceptable. Changes in the appropriate Draft EIR text are included in Chapter 2 and Chapter 4 of this Responses to Comments Document.
- 17-9. This comment suggests the odor monitoring program include the use of an odor panel and that the Applicant be given the opportunity to help design the program in coordination with the regulatory agencies. The use of an odor panel with protocols is identified in the

third bullet of Mitigation Measure 10-5(c). However, the Applicant's refinements are acceptable. Changes in the appropriate Draft EIR text are included in Chapter 2 and Chapter 4 of this Responses to Comments Document.

- 17-10. This comment correctly notes that the Odor Impact Minimization Plan (OIMP) as identified in Control Measure 10-6(a) only applies to the organics processing area of the WRC and the composting operation, not to the WRC mixed waste processing area. Changes in the appropriate Draft EIR text are included in Chapter 2 and Chapter 4 of this Responses to Comments Document.
- 17-11. This comment concurs that Impact 11-2 is less than significant. No response is required.
- 17-12. This comment provides further information regarding control of diesel spills and other chemicals during Project construction and operation. A Control Measure has been added to appropriate Draft EIR text in Chapter 2 and Chapter 4 of this Responses to Comments Document. A revised Surface Water Pollution Prevention Plan (SWPPP) was included as Control Measure 6-3(a).
- 17-13. This comment concurs with the finding of less than significant impact relative to Impact 4-2 and summarizes experience gained at the Central IRRF on compatibility of operations with the adjoining Wildcat Creek Public Access Trail. No response is required.
- 17-14. This comment refers to Mitigation Measure 4-5 and specific text on pages 4-20 and 4-23 in the EIR pertaining to mitigation fees. It expresses the presumption that mitigation fees would apply only to municipal solids waste (MSW) processed at the WRC, but would not apply to current landfill operation while it remains in operation or bulk materials processed at the expanded BMPC.
- The presumption is partially correct. Mitigation Measure 4-5 is intended to cover all "solid waste and processable materials" handled at the BMPC (including the WRC), but will not be collected on waste disposed at the WCCSL. Also see response to comment 8-9A for additional discussion of fees.
- 17-15. This comment correctly notes that Class II landfill leachate will not be pumped to the WCWD sludge lagoons but rather to the City of Richmond WWTP via an existing sludge transport pipeline when the pipeline is not in use. These changes are included in appropriate Draft EIR text in Chapter 4 of this Responses to Comments Document.
- 17-16. This comment provides further clarification of comment 17-15. See response to comment 17-15. Also, further changes to text on page 6-13 of the Draft EIR are included in Chapter 4 of this Responses to Comments Document.
- 17-17. This comment updates when the liquefaction analysis for the WCCSL will be completed. Changes in the appropriate text of the Draft EIR are included in Chapter 4 of this Responses to Comments Document.

- 17-18. This comment correctly notes that the landfill gas-fired power plant noise adjacent to the Trail will be reduced following completion of the 8-foot-high security/visual barrier. No changes to page 12-5 are required as that text refers only to baseline conditions. Changes to page 12-11 text of the Draft EIR are included in Chapter 4 of this Responses to Comments Document.
- 17-19. This comment refers to changes in Appendix 3H, Biosolids Management Plan Summary. The updated summary is included as Appendix D to this Responses to Comments Document.

COMMUNITY DEVELOPMENT DEPARTMENT

PUBLIC HEARING TO CONSIDER THE  
ADEQUACY OF THE DRAFT ENVIRONMENTAL  
IMPACT REPORT PREPARED FOR THE  
BULK MATERIALS, PROCESSING CENTER  
AND RELATED ACTIONS AT THE  
WEST CONTRA COSTA SANITARY LANDFILL

NOVEMBER 25, 2003

ORIGINAL

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
BY: JOANNA BROADWELL, CSR 10959

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CLARK REPORTING  
2161 SHATTUCK AVENUE, SUITE 201  
BERKELEY, CALIFORNIA 94704  
(510) 486-0700

A P P E A R A N C E S:

Chairperson:

DENNIS M. BARRY, AICP

Community Development Director

Community Development Department

651 Pine Street

North Wing-4th Floor

Martinez, CA 94553-0095

(925) 335-1276

Staff:

DEIDRA DINGMAN

Solid Waste Program Manager

Community Development Department

651 Pine Street

North Wing-4th Floor

Martinez, CA 94553-0095

(925) 335-1224

Speakers:

Johnny White

Dr. Henry Clark

Lee Jones

Eric Bledsoe

Debbi Landshoff

John Gioia

Whitney Dolson

--oOo--

1 BE IT REMEMBERED that on Monday, November 25, 2003,  
2 commencing at the hour of 6:33 p.m. at 1410 Kelsey Street,  
3 Richmond, California, before me, JOANNA BROADWELL, a duly  
4 qualified Certified Shorthand Reporter, License No. 10959,  
5 in and for the State of California, reported the following  
6 proceedings.

7 --o0o--

8 PROCEEDINGS

9 MR. BARRY: Good morning, ladies and gentlemen, and  
10 welcome to the November 25th, 2003, meeting of the Contra  
11 Costa County Zoning Administrator. The first item on our  
12 agenda this evening is public comment. If anyone would  
13 like to make a public comment on an item within the  
14 jurisdiction of the Zoning Administrator but not otherwise  
15 listed on the agenda tonight, I would invite them to  
16 submit, please, a green speaker card. And you also can  
17 speak on any item on the agenda. You may wish to fill out  
18 a green speaker card so we'll know when to call you. And  
19 we'll also add you to any mailing lists for any subsequent  
20 public notices on items that appear on the agenda.

21 I do have one speaker card under public comment,  
22 Dr. Henry Clark. Dr. Clark?

23 DR. CLARK: It's been a little confusing there as  
24 to whether to make any comments because I'm sure I'll be  
25 commenting all throughout the process at the appropriate

1 time. But in terms of some of the particular issues and  
2 concerns that I'm observing and are concerned with and have  
3 raised in numerous meetings, and we have raised it tonight,  
4 and hopefully get some sense of those issues addressed in  
5 the draft of the EIR as it relates to the issues of not  
6 only the -- any possible increase on truck traffic north  
7 and how it impacts the community as well as the odors, and  
8 particularly as it relates to the possible expanded  
9 activities of the soil -- referring to the soil biosolids  
10 project that is proposed on the site --

11 MR. BARRY: Dr. Clark, I'd ask if you have comments  
12 about the EIR, that you hold those comments to that item on  
13 the agenda. If you have other things that you would like  
14 to talk to me about that are within the jurisdiction of the  
15 Zoning Administrator, I will be happy to hear about those  
16 comments now. But otherwise, I'll put you down for Item  
17 No. 3 on the agenda.

18 DR. CLARK: Okay. Well, the other items, I didn't  
19 quite see in the EIR, in my brief time that I had it to  
20 review it, is in terms of mitigations, the mitigation  
21 issues. Is that going to be part of --

22 MR. BARRY: Again, I would ask that you come back  
23 up and speak when that item is called. That will be called  
24 later. And I'll put you down for Item 3 to speak on the  
25 Draft EIR on the bulk materials process center. Thank you.



1           Is there anyone else that would like to speak on  
2 public comment on any item within the jurisdiction of the  
3 Zoning Administrator that is not otherwise listed on the  
4 agenda tonight? And I see no one coming forward.

5           We have No. 2, Termination of Easement Rights.  
6 There are no items to be considered under Item No. 2, so  
7 we'll move to Item No. 3. This is a public hearing on the  
8 Draft Environmental Impact Hearing Report. I would like to  
9 ask Deidre Dingman on our staff to make opening comments.

10           MS. DINGMAN: Thank you for coming this evening. I  
11 am Deidre Dingman from the Contra Costa County Community  
12 Development Department, and I'm the planner for this  
13 project. I wanted to review our agenda description for  
14 Item 3, and then just a couple of other opening comments.

15           This is the bulk material processing center and  
16 related action to the West Contra Costa Sanitary Landfill,  
17 County File No. LP022026. This is a public hearing to  
18 consider the adequacy of the Draft Environmental Impact  
19 Report prepared for the bulk material processing center and  
20 related actions to the West Contra Costa Sanitary Landfill.  
21 This Draft Environmental Impact Report has been prepared  
22 for a twofold purpose. The West Contra Costa Sanitary  
23 Landfill, Incorporated, operates a Class II sanitary  
24 landfill located at the foot of Parr Boulevard in Richmond,  
25 California. West Contra Costa Sanitary Landfill is

1 requesting amendments to existing land use permits for its  
2 bulk material processing center that were issued in 1993 by  
3 Contra Costa County and the City of Richmond to allow  
4 development of a new solid waste transfer station and  
5 expanded resource recovery activities.

6 Additionally, a solid waste facilities permit is  
7 also required to allow a maximum of 30 feet of additional  
8 height of landfill waste. Currently, the limit is at  
9 130 feet. And the new elevation limit maximum would be  
10 160 feet, based on the proposed location.

11 Again, just to reiterate, the speaker cards are the  
12 small green sheets which are on the front counter. And  
13 anyone who wishes to speak, please turn those in.

14 Additionally, we will assure that you are added to our  
15 mailing list for notices about future meetings and hearings  
16 on this project. Also, if you're interested in receiving  
17 notices but do not wish to speak, we have a sign-in sheet  
18 that you're welcome to add your name to for future notices.

19 Lastly, also on our table in front there, there are  
20 some business cards of mine. So if you would like to  
21 contact me at some point about the project after the  
22 hearing, please feel free to take one, as well as there are  
23 also agendas for tonight's meeting and the notice of  
24 completion and availability for this EIR project. And that  
25 notice has information regarding a comment period and the

1 deadline. Also locations when the EIR is available, such  
2 as the Richmond Public Library and Supervisor John Gioia's  
3 office. Also, there is a website where the EIR may be  
4 viewed, if interested, free of charge. That information is  
5 also in the notice, and lastly, the address for which  
6 comment letters should be sent pursuant to the notice.  
7 Please make sure to help yourself, if you don't have a  
8 copy. And, again, thank you for coming.

9 MR. BARRY: Thank you, Deidra.

10 The way this hearing works this evening is, we're  
11 here not to talk about whether we like the project or don't  
12 like the project or how the project should or shouldn't be  
13 approved, but rather we're here to determine whether or not  
14 we have comments that relate to the adequacy of this  
15 Environmental Impact Report draft. All of your comments  
16 are being taken down both by tape and by court reporter.  
17 That's why it's also important for us to have a green slip  
18 with your name on it, so we have a correct spelling of your  
19 name so that when the transcript comes out, and we can be  
20 accurate as to who said what.

21 Once the comment period closes on December 22nd,  
22 2003, at 5:00 p.m., and all the written comments have been  
23 received, and the written transcript of the testimony from  
24 this hearing is put together, our consultants and staff  
25 will review all of the environmental comments that are

1 received and will respond to the substantive issues that  
2 are raised with respect to the adequacy of the Draft EIR.

3 And that response to comments document that is  
4 produced will be previewed by the County, and we will  
5 exercise our independent judgment about whether it  
6 adequately covers all of the requirements in the California  
7 Environmental Quality Act. I will then, in a closed  
8 hearing, make a recommendation to the hearing body to the  
9 Contra Costa County Planning Commission and the Board of  
10 Supervisors as to the adequacy of the Draft and response  
11 comments, which together will be the final Environmental  
12 Impact Report for the project.

13 So I say we're not here to talk so much tonight  
14 about whether you like the project or don't. There will be  
15 separate public hearings held before the County Planning  
16 Commission and the Board of Supervisors and separate  
17 hearings held before the Richmond City Council with respect  
18 to whether the project should be approved.

19 And so being on our mailing list is also important  
20 to get public notices that will be sent out letting you  
21 know where the county will be holding its public hearings  
22 and when. And that will be done in a timely fashion before  
23 the hearing. Generally, those notices are sent out at  
24 least 10 days prior to the hearing being held. You're also  
25 welcome to call the staff, Deidra Dingman, at any time if

1 you have questions about the timing of the project  
2 hearings.

3 Once that final Environmental Impact Report has  
4 been certified, then the decision-making bodies can move  
5 forward and make a decision either to approve the project,  
6 deny the project, or approve the project with the  
7 conditions of approval. Any mitigation measures that are  
8 included in the final EIR must be included as conditions of  
9 approval of the project under CEQA.

10 So with that being said, I am now going to invite  
11 speakers that have submitted green speaker cards. Please  
12 come up to the microphone and address your comments with  
13 respect to the adequacy of the Draft Environmental Impact  
14 Report. Our first speaker this evening is Mr. John White.

15 Mr. White?

16 MR. WHITE: Thank you very much. First of all, I  
17 am in favor of Item No. 3. It will benefit this community  
18 and the surrounding communities. I think that it's in the  
19 best interests of the governing body that they take under  
20 consideration about the community at large and how they  
21 feel. And most of the community at large feels that they  
22 do approve this -- that they do like this bulk materials  
23 processing center. From the information that I have  
24 received, I haven't read the EIR report at all, but I do  
25 believe that it will be in our best interest that it be

1 approved.

2 MR. BARRY: Thank you very much. Since your  
3 comments were not strictly related to the Draft  
4 Environmental Impact Report, which you indicated you didn't  
5 read, I would invite you to please come back to the County  
6 Planning Commission or Board of Supervisors and make known  
7 your support of the project at that time. We will put you  
8 on the mailing list so you have notice.

9 Our next speaker is Dr. Henry Clark.

10 DR. CLARK: Thank you, Mr. Barry. I'm Dr. Henry  
11 Clark. I'm representing the West County Toxics Coalition  
12 Environmental Justice Organization here in Richmond for  
13 over 21 years. Also, I'm also a member of the North  
14 Richmond Municipal Advisory Council. The issues relating  
15 to the mitigations that I addressed earlier, I found  
16 those -- they are addressed in the Draft Environmental  
17 Impact Report. The outstanding issue that I am still  
18 concerned with is the issue on Page 414 of the odor issues  
19 that are related to the liquid biosolids. And it indicates  
20 here, if I'm reading this correctly, that at some point  
21 there is going to be a demonstration, a project prior to  
22 the full-scale operation to determine if the liquid  
23 biosolids can be sprayed, applied without creating nuisance  
24 odors.

25 A couple of the questions in that regard is that,

1 since we are talking about approving the decision for  
2 approving the Draft Environmental Impact Report now, but at  
3 some point later down the road you are going to be doing  
4 this demonstration project, so how will the community be  
5 able to comment on the results of that demonstration  
6 project and have any sense at all about the results of  
7 that? Is that going to happen before the -- this draft is  
8 approved, or is there some other process, or what?

9 MR. BARRY: That comment will be responded to in a  
10 response document.

11 DR. CLARK: Okay. The other issue in regard to the  
12 liquid biosolids is in terms of the -- is there any other  
13 permits or agencies that would be involved in the oversight  
14 of dealing with that type of waste?

15 MR. BARRY: Again, these are issues -- we're not  
16 here for an exchange, for you to ask me questions, but  
17 rather for you to give me testimony, and the staff, to  
18 subsequently address those significant environmental issues  
19 you bring up. So that will be addressed then. You may  
20 want separately, outside the hearing setting, to contact  
21 staff with some of these kinds of questions.

22 DR. CLARK: Okay, I will. But in regard to the  
23 questions on this part of the process, they will be  
24 addressed in the final Environmental Impact Report?

25 MR. BARRY: Yes. To the extent that they're

18-1

18-2

1 related to potential for significant impacts and the degree  
2 of those impacts, they must be responded to.

3 DR. CLARK: Okay. Well, at the moment I would like  
4 to see those particular issues addressed. Thank you.

5 MR. BARRY: Thank you. And I would remind the  
6 audience of one factor and inform you of another: One  
7 factor is that we do urge you, if you have additional  
8 thoughts after this public hearing, to please submit  
9 written comments through the closed comment period on  
10 December 22nd, and we will be accepting written comments  
11 through 5:00 o'clock on the 22nd.

12 The other piece of information that we probably  
13 should have indicated earlier is that there are translation  
14 services available in the back of the room for  
15 Spanish-speaking people who are not comfortable speaking in  
16 English. So we have made a translation service available  
17 in case anyone would like to make use of it.

18 The next speaker that we have a green slip for is  
19 Lee Jones.

20 Mr. Lee Jones?

21 MR. JONES: I pass.

22 MR. BARRY: Mr. Jones indicates that he does not  
23 wish to make comments at this time.

24 The next speaker is Eric Bledsoe. I'm sorry if I  
25 got the pronunciation wrong.



1 MR. BLEDSOE: Bledsoe.

2 MR. BARRY: Mr. Bledsoe.

3 MR. BLEDSOE: My comments may not be appropriate.  
4 My name is Eric Bledsoe. I briefly looked through that.  
5 I'm here today because I'm a property owner at 21 Park  
6 Boulevard in Richmond. And your EIR may address the issues  
7 of the problems that currently exist out there with the  
8 dump. I don't know. But if they don't, I would like to  
9 bring them to your attention. I have two facilities, the  
10 Hertz facility and Electronic Innovations, which is an  
11 industrial security contractor. When I moved into this  
12 area 10 years ago -- and prior to that, I had been located  
13 down the street at the old Erickson facility -- I was told  
14 that the dump -- and I own my property there -- I was told  
15 the dump had a lifespan of three to five years. I read the  
16 notice about the goal to expand the facility. And we have  
17 so many issues going on down there such as dust that  
18 literally permeate our building into our air conditioning  
19 system, things like that, trash dumping, vehicles just  
20 driving by without covered loads, or just illegal dumping.

21 Just recently last week, maybe even at the  
22 beginning of the week, the sheriff's department cleaned out  
23 vehicles that had been dumped out there for over a year.  
24 We have extreme traffic issues with the Richmond Parkway  
25 and trucks entering and exiting. And then the hot trucks,

18-3

1    which are food vendors that park there, and there are  
2    customers coming out of the landfill, stop and eat their  
3    burritos, and things like that, that cause other traffic  
4    issues.

5            So I don't know if the EIR addresses that.  If it  
6    does, great.  I'm sure I'll find it.  But if it doesn't,  
7    those problems exist.  And I guess I can respond in writing  
8    to yourself about these issues.  But since I came down  
9    here, and I heard what the testimony period was about, I  
10   figured I'd put my two cents in.  Thank you.

11           MR. BARRY:  Thank you very much.  And certainly the  
12   subject matter that you are referring to are environmental  
13   impacts, and the draft will -- the responsive comments will  
14   either respond substantively if it's not covered  
15   appropriately in the draft, or will point you in the  
16   direction where it is covered in the draft, if it is  
17   covered already.

18           MR. BLEDSOE:  So you'll respond back to me?

19           THE DEPONENT:  There will be a response to the  
20   "comments" document that will be prepared after the close  
21   of the comment period.  But you're certainly welcome to  
22   submit written comments up to the 22nd of December at  
23   5:00 o'clock.

24           Our next speaker card is Debbie Landshoff.

25           MS. LANDSHOFF:  Hi.  I'm not actually submitting

1 comments. I will be submitting written comments, and I was  
2 wondering who on staff -- I have some questions about the  
3 scope of the project and, you know, what it's really --  
4 what it's saying. And I don't know who to ask.

5 MR. BARRY: Deidra Dingman, appearing to your  
6 right, is the project planner on this. So you're certainly  
7 welcome to contact her. I'm sure if you talk to her after  
8 this hearing she'll give you a telephone number or e-mail  
9 address, and she'll be happy to fill you in.

10 I have no further -- oh, here is one. Next speaker  
11 is John Gioia.

12 I note there is no "honor" on here, but you'll all  
13 recognize Supervisor Gioia.

14 MR. GIOIA: Good evening. I'm John Gioia. I  
15 represent this area on the Board of Supervisors for the  
16 City of Richmond. I wanted to make one comment. First,  
17 there is a fair amount of discussion in the EIR on various  
18 mitigation measures to address littering issues. In one of  
19 those on Page 7-20 under 5:

20 "Littering," in the second text paragraph  
21 where it says, "The main sources of litter in  
22 the proposed Project include the WRC and  
23 extended landfill operations afforded by the  
24 height increase and additional capacity."

25 And then it says:

1 "The materials managed in other components of  
2 the BMPC such as concrete and asphalt  
3 crushing, wet/dusty material blending,  
4 composting, wood recovery, and soil  
5 reclamation and biosolids/dredged material  
6 spreading, are not expected to be sign  
7 ificant sources of litter."

8 I would like to add that some of those activities,  
9 specifically concrete and asphalt crushing, compost and  
10 wood recovery, do have impacts on litter in the surrounding  
11 communities. There have been incidents of crushed rock or  
12 asphalt, those kinds of materials, that are dumped as well  
13 in the surrounding community that, in addition, wood  
14 material that would be taken to the dump is eventually  
15 composted has also been dumped. So I think it's important  
16 to address the issue of the impact of some of these other  
17 items here on littering, not just the transfer station  
18 itself, but the garbage taken to the transfer station and  
19 that the mitigation measures recognize that litter is  
20 caused -- litter of various types is caused by some of  
21 these other activities in addition to the transfer station  
22 itself. That's it.

23 MR. BARRY: Thank you. That was the last speaker  
24 card I have -- actually, I have one more. Thank you.

25 The next speaker is Whitney Dolson.

1 DR. DOLSON: Yes. Whitney Dolson, Trails for the  
2 Richmond Action Committee. I had a couple of comments  
3 regarding the Bay Trail portion of the landfill. Phase 1  
4 trail should include the half-mile spur in the southwest  
5 corner of the landfill levy system to the southern reach in  
6 the outer levy. There is no evidence that significant  
7 environmental effects would result from the -- from the  
8 trail on the outer levy, the segment currently isolated by 18-5  
9 breaches, and, hence, no justification for recommending the  
10 deletion of the Phase 4 Bay Trail route, which is specified  
11 in the North Richmond shoreline Specific Plan, because  
12 there is no data -- no data was presented on the species or  
13 number of birds, if any, which use the isolated section on  
14 our levy. And the two-year wildlife and public access  
15 study by Trilo and Soquel found no evidence that human use  
16 of the levy trails affects bird abundance or diversity in  
17 foraging habitats at three locations where mud flats are  
18 exposed at low tide. And the poison oak and blackberry 18-6  
19 should be deleted from the trail-side plant list.

20 Those are my comments.

21 MR. BARRY: Dr. Dolson, your testimony is more  
22 related to the form in which you believe this project  
23 should be conditioned if it's approved than about the  
24 adequacy of the EIR. So I would urge you, please, do make  
25 yourself available, if possible, to make that testimony

1 before the County Land Commission and the board of  
2 supervisors. Thank you.

3 That was the last speaker card that I have. If  
4 there is anyone else in the audience that would like to  
5 make comments on the adequacy of the Draft Environmental  
6 Impact Report that's available, I would ask you to please  
7 come forward at this time. You can fill out a green  
8 speaker card after you finish, if you would like. And I  
9 see no one coming forward at this time.

10 I would very much like to thank you for joining us  
11 this evening and providing this useful commentary that  
12 needs to be considered along with all the written comments.  
13 I find that it's often easier for people to come and make  
14 their comments verbally than it is for them to sit down and  
15 write them out. So we try and do that, and I'll note that  
16 we made a special effort to come out to the community this  
17 evening rather than trying to make you all come to Martinez  
18 on a Monday morning when the Zoning Administrator usually  
19 would hold hearings. And I think that's because the staff  
20 recognizes what a substantial project this is, and how  
21 important it is to the community.

22 So with that, I will thank you all and wish you all  
23 a very happy Thanksgiving with your family and friends.  
24 Thank you very much. This meeting is adjourned.

25 (The hearing adjourned at 6:59 p.m.)

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## REPORTER'S CERTIFICATE

I, Joanna Broadwell, Certified Shorthand Reporter No. 10959 in and for the State of California, hereby certify that the foregoing is a full, true and correct transcript of the proceedings to the best of my ability.

Date: 12/17/03

JB  
Joanna Broadwell CSR # 10959



**LETTER TO  
PUBLIC  
HEARING  
TRANSCRIPT  
RESPONSE**

Public Hearing Transcript  
Hearing Date: November 25, 2003

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- 18-1. This comment inquires whether the public will have future opportunity to comment on the results of the biosolids pilot project. See response to comment 15-2.
- 18-2. This comment inquires about any other permits or agencies that will be involved in the oversight of the biosolids/dredged material spreading operation. At a minimum, the following agencies and related permits will be involved:
- Regional Water Quality Control Board San Francisco Bay Region, and U.S. Environmental Protection Agency, Region 9 Sludge Coordinator—related to compliance with 40 CFR 503 regulations pertaining to Class A and B biosolids, and in RWQCB Order No. R2-2002-0066 which regulates receipt and application of biosolids and dredged material at WCCSL.
  - Contra Costa County Environmental Health and California Integrated Waste Management Board—related to the Solid Waste Facilities Permit.
  - Bay Area Air Quality Management District—related to an Authorization to Construct, and Permit to Operate.
  - U.S. Army Corps of Engineers—related to characterization and screening of dredged materials prior to application or disposal.
  - WCCSL's Waste Acceptance Guidelines (as presented in Appendix 3I of the Draft EIR) which specify level of characterization required prior to receipt of waste materials.
- 18-3. This comment restates opinions expressed in Letter 16 from Electronic Innovations. Please see responses to comments 16-1 through 16-6.
- 18-4. This comment emphasizes the need for the Draft EIR to address the potential for litter and dumping of loads resulting activities in addition to the Central IRRF transfer station or proposed WRC. The impacts and recommended mitigation measures related to litter and illegal dumping are extensively discussed in the Draft EIR, Chapter 4 Land Use, Impact 4-5 and Mitigation Measure 4-5, on pages 4-16 through 4-24.

- 18-5. This comment suggests Phase 4 of the Trail alignment not be deleted. See response to comment 3-2.
- 18-6. This comment suggests that poison oak and blackberry be deleted from the Trail planting list. See response to comment 3-3.

## CHAPTER 4

### REVISIONS TO THE DRAFT EIR

In accordance with Section 15132(e) of the CEQA Guidelines, this chapter summarizes revisions made to the Draft EIR resulting from the response to comments (see Chapter 3). The changes are presented by page number in each chapter that appears in the Draft EIR. The full text of the revised Table 2-1 of the Draft EIR, which summarizes impacts, control measures, and mitigation measures, is included in Chapter 2 of this Responses to Comments Document. Revised or new appendix material is included at the end of this report.

#### Chapter 2. Summary

- Page 2-1. The second sentence of the second paragraph is modified as follows:

~~“West County Landfill~~ **West Contra Costa Sanitary Landfill, Inc.**  
(Applicant) . . .”

- Page 2-4. The projected opening date for the Phase I Trail at the bottom of page 2-4 is amended as follows:

| <u>Trail segment</u> | <u>Projected opening date</u>                         |
|----------------------|-------------------------------------------------------|
| Phase I              | <del>December 1, 2003</del> <b><u>Spring 2004</u></b> |

- Page 2-9. The third sentence of the bulleted paragraph under Class II Landfill is amended as follows:

“According to the Applicant’s most recent site life projections based on a landfill height of 130 msl (Table ~~3-5~~ **3-6** in Chapter 3), the landfill will be filled by ~~October 2003~~ **May 2004** if the former Soil Remediation Building remains in place . . .”

- Page 2-11. The first sentence of the third paragraph is modified as follows:

“The Preferred Environmental Alternative (PEA), as discussed in Chapter 13 of this EIR, includes the Project proposed by the Applicant (**including increasing the maximum landfill elevation (top of waste) to 160 feet msl**) the mitigation measures . . .”

- Page 2-11. The first sentence of the third paragraph is modified as follows:  
 “. . . The Preferred Environmental Alternative . . . includes . . . elimination of Phase 4 of the Trail **including the proposed levee along the west side of Area C to the first breach in the outer levee,** the Area A location . . .”
- Page 2-15. Control Measure 5-1(a) is modified as follows:  
 “a) The liquefaction analysis for the WCCSL would be updated in ~~late 2003~~ **2004** and recommendations . . .”
- Page 2-28. The following provision is added to Mitigation Measure 9-1:  
 “g) **Due to the possible hazard to Trail users, the Bayside Trail (Barrier) Planting Recommendations would be revised to eliminate poison oak from the revegetation planting palette and from any future landscaping plans for the Project.**”
- Page 2-29. Mitigation Measure 9-4(a) is modified as follows:  
 “a) The Phase 4 alignment of the Trail would be eliminated from the proposed Project to avoid the ~~require~~ **resulting** disturbance to shoreline habitat on this portion of the site and prevent the potential disruption to wildlife habitat and movement along the existing isolated levee segment. **The proposed Phase 1 Trail improvements from the southern end of the mainland levee along the west side of Area C to the first breach in the outer levee would also be eliminated from the proposed Project, serving to minimize potential disturbance to approximately half of the open water and mudflat habitat in Area C. Split rail fending or similar barrier would be installed within 10 yards of the point where the levee narrows north of the proposed kayak staging area.**”
- Page 2-29. The following addition is made to Mitigation Measure 9-4:  
 “c) **Permanent signage would be installed as part of the required interpretive program on both sides of the water access at the proposed kayak staging area to inform kayak users that access into the sloughs of the coastal salt marsh to the southeast is prohibited during the nesting season to prevent possible disturbance to rails and other wildlife. The signage would state:**

**Sensitive Wildlife Habitat**  
**No Kayak Access to Marshland and Sloughs**  
**During Bird Nesting Season –**  
**February 1 through August 31”**

- Page 2-30. Mitigation Measure 10-1(f) is amended as follows:
  - “(f) Exposed stockpiles (dirt, sand, etc.) would either be enclosed, covered, watered twice daily or more often if windy **unless a non-erosive soil crust is maintained**, or receive application of non-toxic soil stabilizers.”
- Page 2-31. Control Measure 10-2(c) is modified as follows:
  - “(c) Roads, unloading areas and the processing area of the WRC **mixed waste processing area** would be paved, . . .”
- Page 2-31. Control Measure 10-2(g) is modified as follows:
  - “(g) ~~Green waste, w~~Wood waste and composting materials would be watered as unloaded, **the surfaces of the unloading areas would be routinely sprayed with water during the dry season, and materials would be periodically watered during the dry season prior to grinding.**”
- Page 2-35. The third bulleted item under Mitigation Measure 10-5(c) is modified as follows:
  - “... collected via odor panel with flux chamber protocols. **The Applicant shall help design the odor monitoring program with regulatory agency input and oversight.** Downwind odor data . . .”
- Page 2-36. Control Measure 10-6(a) is modified as follows:
  - “(a) Only wastes that are consistent with 14 CCR, §17863.4 ~~and the OIMP~~ would be accepted.”
- Page 2-42. The following Control Measure is added to Impact 11-1:
  - “(g) **If the Waste Shuttle Facility needs to be used until the WRC construction is complete, wind screens and litter fencing would be used during high wind conditions to help minimize the risks to employees at the sorting line, and to control litter.**”
- Page 2-42. The following Control Measure is added to Impact 11-3:
  - “(a) **Contract agreements with builders and tenant operators shall contain control measures for spills of diesel and other chemicals.**”
- Page 2-45. Control Measure 11-6(b) is modified as follows:
  - “(b) ~~Green waste, w~~Wood waste and composting materials would be watered as unloaded, **the surfaces of the unloading areas would be routinely**

**sprayed with water during the dry season, and materials would be periodically watered during the dry season prior to grinding.**

### Chapter 3. Project Description

- Page 3-3. The second sentence of the last paragraph is modified as follows:  
  
“~~This range in volume of waste represents approximately 650 TPD7 (365 days per year average).~~ **From January 1 to November 30, 2003, the wastes received at the site have averaged 802 TPD7.**”
- Page 3-5. The bulleted items are modified as follows:  
  
“? Treated auto shredder waste which is **not** shredded on site (existing).”  
  
“? **Green material most of which is shredded on site**”  
  
“? Construction and demolition (C&D) debris which **is shredded on site and includes mixtures . . .**”
- Page 3-7. The first sentence at the top of the page is modified as follows:  
  
“. . . WCWD Sewer Use Ordinance No. 9-19-89, Permit No. 011 issued by the WCWD to the Applicant, **and the agreement/permit for leachate disposal executed between the Applicant and WCWD on March 26, 1999.**”
- Page 3-15. Footnote “b” for Table 3-3 is modified as follows:  
  
“About ~~42~~ **12,000** tons per year of dried lagooned sludge . . .”
- Page 3-19. The second sentence of the second full paragraph is modified as follows:  
  
“The design capacity of the WRC mixed waste processing area would be 1,000 TPD7 **(1,400 TPD7 peak)**, which is . . .”
- Page 3-26. Table 3-4 is modified as follows:

**Table 3-4. Projected Diversion Provided by Facilities at the WCCSL**

| Facility component                                                | Waste received, TPD <sup>7</sup>     | Recycle/reuse, TPD <sup>7</sup> | Remaining waste landfilled, TPD <sup>7</sup> | Amount diverted, percent |
|-------------------------------------------------------------------|--------------------------------------|---------------------------------|----------------------------------------------|--------------------------|
| WRC – Mixed waste area                                            | 1,000                                | 250                             | 750                                          | 25                       |
| WRC – Organics processing area                                    | Included in composting or wood waste |                                 |                                              |                          |
| Composting                                                        | 450                                  | <del>504</del> <b>405</b>       | 45                                           | 90                       |
| Wood waste recovery                                               | 360                                  | 324                             | 36                                           | 90                       |
| Concrete/asphalt processing                                       | 1,450                                | 1,450                           | 0                                            | 100                      |
| Soil reclamation (soil reclamation + biosolids/dredged materials) | 535                                  | 510                             | 25                                           | 95                       |
| Wet/dusty materials                                               | 140                                  | 130                             | 10                                           | 93                       |
| WCCSL Totals                                                      | 3,935                                | 3,069                           | 866                                          | 78                       |
| Central IRRF (2002) Totals                                        | 150                                  | 128                             | 22                                           | 85                       |
| West County Processing Totals                                     | 4,085                                | 3,197                           | 888                                          | 78                       |

Source: WCL and Brown and Caldwell, January 2003.

- Page 3-35. The first sentence of the first paragraph is modified as follows:

“... the total amount of wastes estimated to be in place in the Class II site was about ~~19,299,000~~ **19,503,000** CY or ~~10.6~~ **10.754** million tons as of ~~May 31, 2002~~ **July 2003,**<sup>38</sup> **based on ongoing capacity analyses by the Applicant.**”

- Page 3-42. The projected opening date for the Phase I Trail is modified as follows:

“Phase I ~~December 1, 2003~~ **Spring 2004**”

- Page 3-43. The listing of permits is modified to include the following:

|                                                  |                       |
|--------------------------------------------------|-----------------------|
| <u>Permit title and number</u>                   | <u>Issuing agency</u> |
| <b><u>Major Facility Review Permit</u></b>       | <b><u>BAAQMD</u></b>  |
| <b><u>Facility IIA 1840 (Title V permit)</u></b> |                       |

#### **Chapter 4. Land Use, Plans, and Policies**

- Page 4-2. The last sentence of the second paragraph is modified as follows:

“Areas **A, B, and C** ~~was~~ **were** originally intended . . .”

- Page 4-23. The last sentence of the Hotline subsection is modified as follows:

“...debris shall be collected within 24 **to 48** hours of verification, **unless additional time is allowed by the applicable permitting authority.**”

## Chapter 5. Geology, Soils, and Seismicity

- Page 5-6. The first full paragraph is modified as follows:

“The Vacaville-Winters earthquake of 1892 occurred on the CRCV boundary approximately ~~29~~ **37** miles north of the WCCSL, and had an estimated magnitude of ~~6.8~~ **6.4** ( $M_w$ ).<sup>75,83</sup> Two after shocks were reported in 1892 of magnitudes 5.8 and 6.4 in the vicinity of Vacaville. Other activity on the CRCV includes a magnitude ~~6.3~~ **6.0** event near Antioch, approximately ~~12~~ **26** miles northeast of the site in 1889, and a magnitude ~~5.9~~ **6.0** event in Patterson, approximately ~~45~~ **68** miles southeast of the site in 1866.”
- Page 5-10. The fourth sentence of the second complete paragraph is amended as follows:

“As discussed in Chapter 6, Section D3, however, a separate Class II landfill leachate line ~~to the WCWD sludge lagoons~~ will be completed in **February 2004.** **The pipeline will allow Class II leachate (but not HWMF leachate) to be transported directly to the WCWD plant. The WCWD will then route the leachate to the City of Richmond Wastewater Treatment Plant through the existing sludge transport pipeline, which joins the WCWD and City plants, when the pipeline is not in use.**
- Page 5-10. The first sentence of the fourth full paragraph is modified as follows:

“The soil-attapulgitic slurry wall is ~~8 to 10~~ **located about 40** feet south of the former Soil Remediation Building . . .”
- Page 5-13. Item 2 is modified as follows:

“~~This peer review is ongoing.~~ **The peer review was completed in May 2003 and concurred with the analysis results.**”
- Page 5-17. The last sentence of the incomplete paragraph at the top of the page is amended as follows:

“That work is scheduled to be completed in ~~late 2003~~ **2004** and recommendations . . .”
- Page 5-17. Control Measure 5-1(a) is modified as follows:

“a) The liquefaction analysis for the WCCSL would be updated in ~~late 2003~~ **2004** and recommendations . . .”



- Page 5-23. The second sentence of the paragraph on Global Landfill Stability is modified as follows:  
  
“This analysis was conducted pursuant to RWQCB Order No. R2-2001-0066 and the peer review of the analysis as required by the Order ~~is ongoing~~ **was completed in May 2003 and concurred with the analysis results.**”
- Page 5-25. Figure 5-3 has been modified to show the correct location of Section 1-1 and is included at the end of this chapter.

## Chapter 6. Water Resources

- Page 6-4. The last sentence at the bottom of the page is amended as follows:  
  
“However, construction of a separate Class II leachate line ~~to the WCWD sludge lagoons~~ **is** scheduled to be completed by ~~late 2003,~~ **February 2004.** ~~leachate flows will then be routed directly to the City’s Wastewater Treatment Plant.~~ **The pipeline will allow Class II leachate (but not HWMF leachate) to be transported directly to the WCWD plant. The WCWD will then route the leachate to the City of Richmond Wastewater Treatment Plant through the existing sludge transport pipeline, which joins the WCWD and City plants, when the pipeline is not in use.**
- Page 6-7. The following sentence is added to the bottom of the first paragraph as follows:  
  
“**However, San Pablo Creek is now being re-monitored in 2003/2004 per the direction of DTSC with the results also being submitted to the RWQCB.**”
- Page 6-7. Item 5 is modified as follows:  
  
“5. September 1, 2004 **2005** – submittal . . .”
- Page 6-7. The second sentence of the last paragraph is modified as follows:  
  
“The SWPPP (~~December 1996~~ **August 2003**) is included . . .”
- Page 6-8. The first bulleted item is modified as follows:  
  
“Water Quality Order Numbers 91-13-DWA and 92-12-DWQ (NPDES CAS000001), and **Permit No. 97-03-DWQ.**”
- Page 6-9. Figure 6-3 has been deleted from the Draft EIR.

- Page 6-13. The last sentence of the fourth full paragraph is modified as follows:

“For discharge of Class II leachate directly to the City’s treatment plant, the Applicant would comply with City Ordinance No. 3-00 and the agreement executed with the City on April 24, 2001.”<sup>48</sup> – **There are various agreements in place between the Applicant, the City, and WCWD that involve the discharge of the Class II leachate from the landfill ultimately to the City’s treatment plant. Because the discharge first goes to the WCWD, the Applicant must comply with all applicable WCWD regulations and ordinances. Through the agreements, WCWD is the “discharger” and must comply with City Ordinance No, 3-00 as does the Applicant, indirectly.**”

## Chapter 7. Aesthetics and Visual Quality

- Page 7-16. The following paragraphs have been added to the bottom of the page. Figures 7A and 7B are included at the end of this chapter.

**“The spreading and drying of biosolids and dredged materials on the landfill sideslopes would also not create a significant adverse aesthetic impact. Photographs provided by the Applicant are included as Figures 7A and 7B which illustrate the visual aspects of biosolids application on the sideslopes based on actual operation experience in 2003. The photographs were taken from the Phase 1 Trail alignment and view the southern slope of the landfill.**

**Figure 7A is a view of the sideslope which shows grass-covered areas where biosolids were spread in 2001 and 2002 and barren areas which had not yet received 2003 biosolids applications and which were infertile. The barren areas shown would be typical of the areas of the southern slope that would receive biosolids/dredged materials. In the proposed Project, the spreading and drying operation would start in April and the other grass-covered slopes would soon begin to dry out and the grass color would change to gray and brown.**

**Figure 7B shows the boundaries of the 2003 south slope biosolids spreading areas which received biosolids applications during the summer and fall of 2003 after the drying cycle. The figure shows areas where straw was spread to cover the biosolids and areas where straw coverage was not provided. The pile of compost in the background is called out as a reference for the appropriate color of the biosolids when first being spread on the sideslope. After several weeks of drying, the biosolids application areas would have a gray or tan color. Drying produces a crust and when this crust is broken by a tractor working the slope, the darker color would reappear until the next drying occurred. Eventually, grass will return to the sideslope and the area will be green in color during the winter and early spring months. Thus, throughout the year, the sideslope areas would appear as a mosaic of different earthtone colors that is not considered substantially adverse.**

## Chapter 8. Traffic and Circulation

- Page 8-22. The third sentence of the first paragraph of Impact 8-6 is modified as follows:

“The Model also shows the extension of Hilltop Drive being connected to the Richmond Parkway in 2015, **though this connection occurred in 2003.**”
- Page 8-26. Add the following to the bottom of the second paragraph:

**“The Applicant has indicated that business management practices at the WRC would result in the number of transfer vehicles to be minimized to control operating costs, which would result in travel times being spaced throughout the day. The Applicant anticipates that the 3 to 6 transfer vehicles entering the I-80 freeway in a 1-hour period would be spaced over the 1-hour period, thus minimizing impacts to traffic congestion.”**

## Chapter 9. Biological Resources

- Page 9-14. The following additional provision is added to Mitigation Measure 9-1:

**“g) Due to the possible hazard to Trail users, the Bayside Trail (Barrier) Planting Recommendations would be revised to eliminate poison oak from the revegetation planting palette and from any future landscaping plans for the Project.”**
- Page 9-18. Mitigation Measure 9-4(a) is modified as follows:

“a) The Phase 4 alignment of the Trail would be eliminated from the proposed Project to avoid the ~~require~~ **resulting** disturbance to shoreline habitat on this portion of the site and prevent the potential disruption to wildlife habitat and movement along the existing isolated levee segment. **The proposed Phase 1 Trail improvements from the southern end of the mainland levee along the west side of Area C to the first breach in the outer levee would also be eliminated from the proposed Project, serving to minimize potential disturbance to approximately half of the open water and mudflat habitat in Area C. Split rail fencing or similar barrier would be installed within 10 yards of the point where the levee narrows north of the proposed kayak staging area.**”
- Page 9-18. The following provision is added to Mitigation Measure 9-4:

- “c) Permanent signage would be installed as part of the required interpretive program on both sides of the water access at the proposed kayak staging area to inform kayak users that access into the sloughs of the coastal salt marsh to the southeast is prohibited during the nesting season to prevent possible disturbance to rails and other wildlife. The signage would state:

**Sensitive Wildlife Habitat**  
**No Kayak Access to Marshland and Sloughs**  
**During Bird Nesting Season –**  
**February 1 through August 31”**

## Chapter 10. Air Quality and Odor

- Page 10-3. The second and third sentences in the last paragraph are modified as follows:

“The closest monitoring site to the WCCSL is located in San Pablo (a few miles ~~west~~ **east** of the WCCSL site). Table 10-3 summarizes air quality data from this monitoring site during the period ~~1999-2001~~ **2000-2002**.”
- Page 10-6. The last sentence from the first paragraph is modified as follows:

“The Federal and State standards for ozone are ~~also~~ exceeded . . .”
- Page 10-7. The second sentence of the third paragraph and the first sentence of the fourth paragraph are modified as follows:

“Additionally, the BAA**Q**MD is responsible . . .”

“The WCCSL operates under permits from the ~~BAAGMD~~ **BAAQMD**.”
- Page 10-8. The following paragraph is added after the first paragraph:

**“BAAQMD Regulation 6 limits the quantity of particulate matter in the atmosphere through the establishment of limitations on emission rates, concentration, visible emissions and opacity. Emission rate limits are in the form of maximum particulate mass loading rates within exhaust gases. This regulation prohibits extension of visible particulate plumes extending onto neighbor properties. Opacity limitations are maximum allowable levels of “darkness” for visible plumes.”**

- Page 10-8. The following paragraph is added as the first paragraph in Section 2b:  

**“The BAAQMD is responsible for regulating odors at all areas of the landfill, with the exception of odors from the composting/co-composting operations. In accordance with AB 59, which became law in 1995, odors from composting operations are regulated by the California Integrated Waste Management Board (CIWMB) through the Local Enforcement Agency (LEA). Odors associated with other activities at the landfill (e.g., green waste and wood waste processing, and sludge handling) are regulated by the BAAQMD.”**
- Page 10-9. The second sentence of the third full paragraph is amended as follows:  

“The revised **composting** regulations were adopted by the CIWMB at its November 19-20, 2002, meeting **and the regulations became effective April 2003.**”
- Pages 10-14, 10-15, 10-16. Replace Tables 10-4, 10-5, and 10-6 with revised tables, shown on the following pages.
- Page 10-17. The second sentence of the third paragraph is modified as follows:  

“Two separate models were ~~constructed~~ **run.**”
- Page 10-18. Mitigation Measure 10-1(f) is modified as follows:  

“(f) Exposed stockpiles (dirt, sand, etc.) would either be enclosed, covered, watered twice daily or more often if windy **unless a non-erosive soil crust is maintained**, or receive application of non-toxic soil stabilizers.”
- Page 10-19. Control Measure 10-2(c) is modified as follows:  

“(c) Roads, unloading areas and the processing area of the WRC **mixed waste processing area** would be paved, . . .”
- Page 10-19. Control Measure 10-2(g) is modified as follows:  

“(g) ~~Green waste, w~~**Wood waste** and composting materials would be watered as unloaded, **the surfaces of the unloading areas would be routinely sprayed with water during the dry season, and materials would be periodically watered during the dry season prior to grinding.**”

**Table 10-4. Existing Project-Generated Emissions (Revised)**

| Emission source                           | ROG <sup>a</sup> | NO <sub>x</sub> <sup>a</sup> | PM <sub>10</sub> <sup>a</sup>        |
|-------------------------------------------|------------------|------------------------------|--------------------------------------|
| On-site emissions, pounds/day             |                  |                              |                                      |
| Process emissions                         |                  |                              |                                      |
| Landfill/gas collection <b>system</b>     | 0.2              | 0.0                          | 144.0                                |
| Landfill gas combustion                   | 9.0              | 57.1                         | 9.0                                  |
| Concrete crushing                         | 0.0              | 0.0                          | 5.0                                  |
| Asphalt crushing                          | 0.0              | 0.0                          | 5.0                                  |
| Concrete screening                        | 0.0              | 0.0                          | 13.0                                 |
| Concrete/asphalt storage                  | 0.0              | 0.0                          | 61.0                                 |
| Wood shredder                             | 0.0              | 0.0                          | 52.0                                 |
| Wood waste screener                       | 0.0              | 0.0                          | 20.0                                 |
| Soil handling                             | 0.0              | 0.0                          | 0                                    |
| Dusty material handling                   | 0.0              | 0.0                          | 0                                    |
| Mobile equipment/ vehicle exhaust         | 39.8             | 296.6                        | 12.3                                 |
| Fugitive emissions                        | --               | --                           | 91.7                                 |
| On-site total                             | 49.0             | 353.7                        | 413.0                                |
| Off-site emissions, pounds/day            |                  |                              |                                      |
| Off-site road vehicles <del>exhaust</del> | 44.5             | 366.6                        | <del>9.2</del> <b><u>36.3</u></b>    |
| Total emissions, pounds/day               |                  |                              |                                      |
| Grand total, on and off site              | 93.5             | 720.3                        | <del>422.2</del> <b><u>449.3</u></b> |

- a.     ROG =        Reactive Organic Gases  
        NO<sub>x</sub> =        Nitrogen Oxides  
        PM<sub>10</sub> =       Particulate Matter, 10 Microns

Source: Don Ballanti, Air Quality Consultant, March 2003.

**Table 10-5. Year 2008 Project-Generated Emissions (Revised)**

| Emission source                           | ROG <sup>a</sup>                 | NO <sub>x</sub> <sup>a</sup>     | PM <sub>10</sub> <sup>a</sup>        |
|-------------------------------------------|----------------------------------|----------------------------------|--------------------------------------|
| On-site emissions, pounds/day             |                                  |                                  |                                      |
| Process emissions                         |                                  |                                  |                                      |
| Landfill/gas collection <b>system</b>     | <del>0.0</del> <b>0.1</b>        | 0.0                              | 0.0                                  |
| Landfill gas combustion                   | 8.2                              | 52.0                             | 8.2                                  |
| Concrete crushing                         | 0.0                              | 0.0                              | 62.3                                 |
| Asphalt crushing                          | 0.0                              | 0.0                              | 62.3                                 |
| Concrete screening                        | 0.0                              | 0.0                              | 162.0                                |
| Concrete/asphalt storage                  | 0.0                              | 0.0                              | 760.1                                |
| Wood shredder                             | 0.0                              | 0.0                              | 218.4                                |
| Wood waste screener                       | 0.0                              | 0.0                              | 84.0                                 |
| Soil handling                             | 0.0                              | 0.0                              | 4.2                                  |
| Dusty material handling                   | 0.0                              | 0.0                              | 17.0                                 |
| Mobile equipment/ vehicle exhaust         | 26.8                             | 156.1                            | 4.4                                  |
| Fugitive emissions                        | --                               | --                               | 96.2                                 |
| On-site total                             | <del>35.0</del> <b>35.1</b>      | 208.1                            | <del>1179.0</del><br><b>1479.1</b>   |
| Off-site emissions, pounds/day            |                                  |                                  |                                      |
| Off-site road vehicles <del>exhaust</del> | <del>39.1</del> <b>41.1</b>      | <del>425.8</del> <b>457.1</b>    | <del>11.2</del> <b>54.0</b>          |
| Total emissions, pounds/day               |                                  |                                  |                                      |
| Grand total, on and off site              | <del>74.1</del> <b>76.2</b>      | <del>633.9</del> <b>665.2</b>    | <del>1490.2</del><br><b>1533.1</b>   |
| Change from existing                      | <del>-19.3</del><br><b>-17.3</b> | <del>-86.4</del><br><b>-55.1</b> | <del>+1068.0</del><br><b>+1083.8</b> |

- a.     ROG =       Reactive Organic Gases  
           NO<sub>x</sub> =       Nitrogen Oxides  
           PM<sub>10</sub> =     Particulate Matter, 10 Microns

Source: Don Ballanti, Air Quality Consultant, March 2003.

**Table 10-6. Year 2015 Project-Generated Emissions (Revised)**

| Emission source                           | ROG <sup>a</sup>                     | NO <sub>x</sub> <sup>a</sup>           | PM <sub>10</sub> <sup>a</sup>            |
|-------------------------------------------|--------------------------------------|----------------------------------------|------------------------------------------|
| On-site emissions, pounds/day             |                                      |                                        |                                          |
| Process emissions                         |                                      |                                        |                                          |
| Landfill/gas collection <b>system</b>     | <del>0.0</del> <b><u>0.1</u></b>     | 0.0                                    | 0.0                                      |
| Landfill gas combustion                   | 5.3                                  | 34.0                                   | 5.4                                      |
| Concrete crushing                         | 0.0                                  | 0.0                                    | 83.0                                     |
| Asphalt crushing                          | 0.0                                  | 0.0                                    | 83.0                                     |
| Concrete screening                        | 0.0                                  | 0.0                                    | 215.8                                    |
| Concrete/asphalt storage                  | 0.0                                  | 0.0                                    | 1012.6                                   |
| Wood shredder                             | 0.0                                  | 0.0                                    | 291.2                                    |
| Wood waste screener                       | 0.0                                  | 0.0                                    | 352.8                                    |
| Soil handling                             | 0.0                                  | 0.0                                    | 6.0                                      |
| Dusty material handling                   | 0.0                                  | 0.0                                    | 22.6                                     |
| Mobile equipment/ vehicle exhaust         | 32.6                                 | 189.3                                  | 5.3                                      |
| Fugitive emissions                        | --                                   | --                                     | 128.3                                    |
| On-site total                             | <del>37.9</del> <b><u>38.0</u></b>   | 261.2                                  | 2206.0                                   |
| Off-site emissions, pounds/day            |                                      |                                        |                                          |
| Off-site road vehicles <del>exhaust</del> | <del>29.9</del> <b><u>30.8</u></b>   | <del>267.2</del> <b><u>284.5</u></b>   | <del>40.2</del> <b><u>52.7</u></b>       |
| Total emissions, pounds/day               |                                      |                                        |                                          |
| Grand total, on and off site              | <del>67.8</del> <b><u>68.8</u></b>   | <del>528.4</del> <b><u>545.7</u></b>   | <del>2246.2</del> <b><u>2258.7</u></b>   |
| Change from existing                      | <del>-25.6</del> <b><u>-24.7</u></b> | <del>-191.9</del> <b><u>-174.6</u></b> | <del>+1794.0</del> <b><u>+1809.4</u></b> |

- a.     ROG =       Reactive Organic Gases  
           NO<sub>x</sub> =       Nitrogen Oxides  
           PM<sub>10</sub> =     Particulate Matter, 10 Microns

Source: Don Ballanti, Air Quality Consultant, March 2003.



- Page 10-28. The third bulleted item for Mitigation Measure 10-5(c) is modified as follows:  
  
“... collected via odor panel with flux chamber protocols. **The Applicant shall help design the odor monitoring program with regulatory agency input and oversight.** Downwind odor data . . .”
- Page 10-28. The third sentence of the first paragraph under Impact 10-6 is modified as follows:  
  
“With the proposed WRC, mixed waste processing operations would be in an enclosed structure (see Appendix 3D, Figure 3D-4+2).”
- Page 10-29. Control Measure 10-6(c) is modified as follows:  
  
“a) Only wastes that are consistent with 14 CCR §17863.4 ~~and the OIMP~~ would be accepted.”
- Page 10-33. The first sentence of the second full paragraph is modified as follows:  
  
“Extended landfill disposal would be a source of odor but, as noted in ~~Section A-5~~ **Impact 10-5** of this chapter . . .”

## Chapter 11. Health and Safety

- Page 11-1. The third sentence of the last paragraph is modified as follows:  
  
“~~An East Bay Municipal Utility District (EBMUD) water system hydrant is located one block off site near the intersection of Parr Boulevard and Garden Tract Road.~~ **During 2003, two fire hydrants were installed and placed in operation on the WCL property; one at the south end of San Pablo Creek bridge and the second near the landfill gas power plant.**”
- Page 11-7. The third sentence of the second paragraph is modified as follows:  
  
“In early January 2001, an unusually large number of gulls were present at the WCCSL and . . .”
- Page 11-9. The following Control Measure is added:  
  
“**g) If the Waste Shuttle Facility needs to be used until the WRC construction is complete, windscreens and litter fencing will be used during high wind conditions to help minimize the risks to employees at the sorting line and to control litter.**”

- Page 11-21. The following Control Measure is added to Impact 11-3:  
**“a) Contract agreements with builders and tenant operators shall contain control measures for spills and other chemicals.”**
- Page 11-22. The first sentence of the first paragraph is modified as follows:  
 “There should not be a significant increase in risks from LFG migration at the relocated equipment ~~office~~ **maintenance** building . . .”
- Page 11-27. The sixth sentence of the first paragraph is deleted as follows:  
~~“Both outdoor and indoor air in the natural environment contain all of the microorganisms, in variable amounts, that are associated with composting.”~~
- Page 11-29. Control Measure 11-6(b) is modified as follows:  
~~“b) Green waste, w~~**Wood waste and composting materials would be watered as unloaded, the surfaces of the unloading areas would be routinely sprayed with water during the dry season, and materials would be periodically watered during the dry season prior to grinding.”**

## Chapter 12. Noise

- Page 12-3. The end of the second paragraph is modified as follows:  
 “can occur for every doubling of distance **from a point source**, depending on land uses and weather conditions. **Line sources, such as highways, typically attenuate at a rate of 3 to 4.5 dBA for every doubling of distance.**”
- Page 12-5. The first sentence of the fourth paragraph is modified as follows:  
 “. . . to characterize the existing noise environment at the WCCSL **(Figure 12-1)**.”
- Page 12-5. The third sentence of the fourth paragraph is modified as follows:  
 “. . . approximately 1,365 feet from the LFG power plant **(Site 1)**, the average . . .”
- Page 12-5. The fourth sentence of the fourth paragraph is modified as follows:  
 “Farther west along the southerly border (and Phase 1 Trail alignment), approximately 3,910 feet from the LFG power plant **(Site 2 on Figure 12-1)**, average . . .”

- Page 12-6. The first sentence of the first paragraph is modified as follows:

“... automobile traffic on the Parkway **(Figure 12-1)**.
- Page 12-6. The second sentence of the first paragraph is modified as follows:

“... at a distance of 210 feet from the centerline of Richmond Parkway **(Site 3)** and the other ... from the centerline of Richmond Parkway **(Site 4)**.
- Page 12-6. The following sentence is added to the full first paragraph:

**“The DNL along Richmond Parkway currently exceed the County and City of Richmond goal for outdoor noise exposure in residential areas where there are no sound walls.”**
- Page 12-7. The following sentence is added to the end of the first paragraph:

**“The County does not have a quantitative noise ordinance that would limit landfill noise emissions.”**
- Page 12-9. The second paragraph is modified as follows:

“For purposes of this evaluation, a 3dBA increase in ambient noise levels **(either hourly L<sub>eq</sub> or DNL)** over those existing . . .”
- Page 12-11. The following sentence is added after the first sentence of the last paragraph:

“... of about 80 dBA would be expected, **without any noise attenuating measures. The Applicant, however, will be constructing an 8-foot-high security/visual barrier berm in this area, which would reduce noise exposure to Trail users.** ~~However,~~ **This would . . .**”
- Page 12-15. The end of the paragraph is amended as follows:

“... be less than 3 dBA along the Richmond Parkway, ~~and~~ **This is based on the fact that the volume of Project traffic projected under cumulative conditions is expected to be 43 percent greater than existing. Assuming that the truck percentage remains the same, the hourly L<sub>eq</sub> and the DNL would increase by 1.6 dBA.** This is, therefore, less than significant.

## Chapter 13. Alternatives

- Page 13-46. Subsection 4 is modified as follows:

### 4. Public Access Trail

A key recommended mitigation measure in Chapter 9, Biological Resources, is the elimination of the Phase 4 alignment of the Trail **and the proposed Phase 1 Trail improvements from the southern end of the mainland levee along the west side of Area C to the first breach in the outer levee.** The Phase 4 alignment **These segments of the Trail** would loop around WCCSL Area C. Because the levee around Area C has been breached to allow for tidal action, two pedestrian bridges would need to be constructed. Chapter 9 **This EIR** recommended Mitigation Measure 9-4(a) to eliminate Phase 4 **and this Phase 1 segment** because the levee provides important resting, roosting, and nesting habitat for birds. Human access associated with the Phase 4 **these segments of the Trail** alignment would greatly diminish and possibly eliminate the use of this area by many species. Thus, the PEA includes Phases 1 **(as modified)**, 2, and 3 of the Trail as described in Chapter 3.

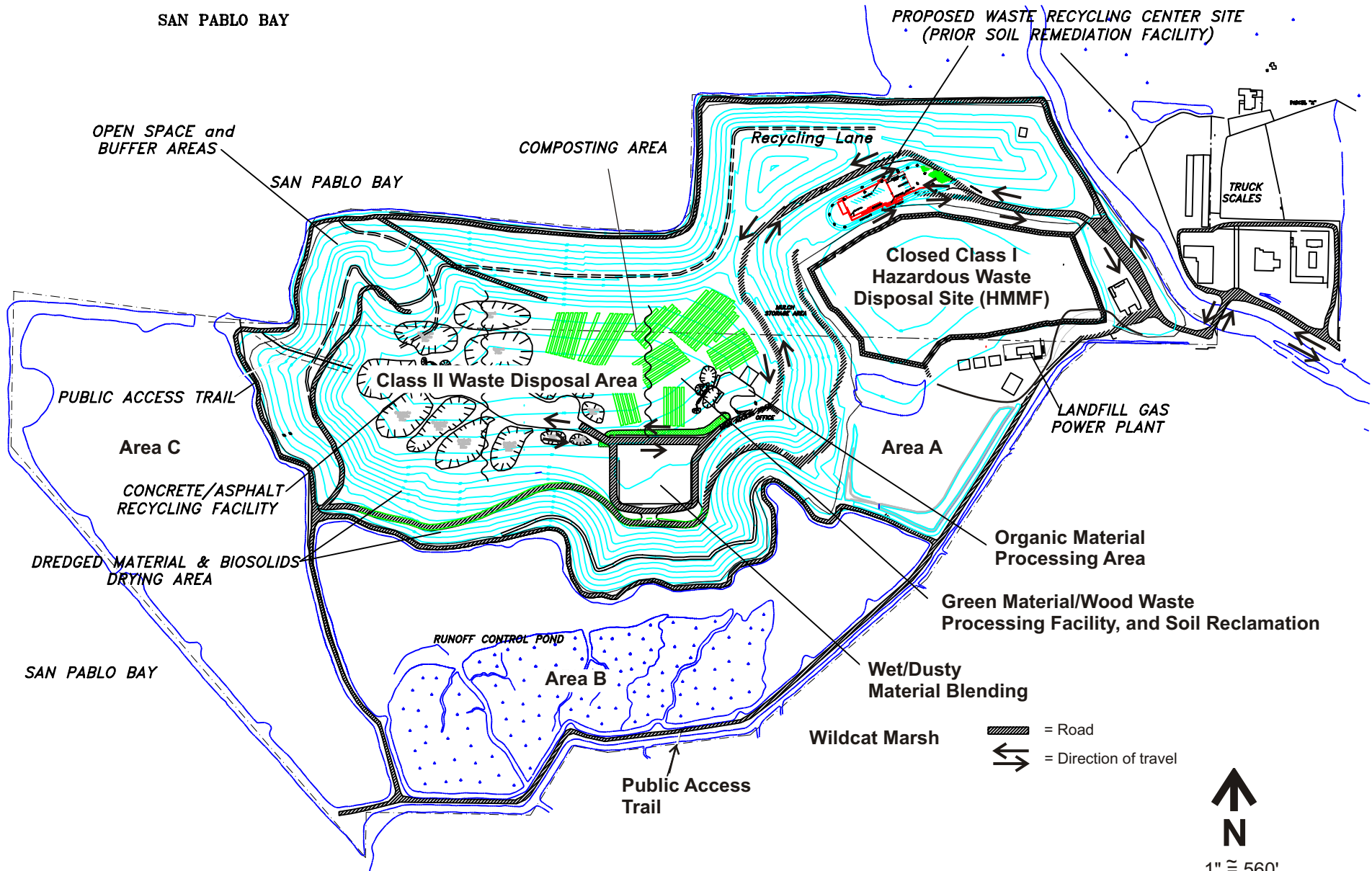
## Revised/New Appendices

- Appendix A. WCCSL Waste Acceptance Guidelines (Revised)
- Appendix B. Draft EIR Appendix 10A, Spreadsheets for Calculation of Process Emissions (Revised)
- Appendix C. Vehicle Trips Calculations (New)
- Appendix D. Draft EIR Appendix 3H, Biosolids Management Plan Summary (Revised)

**NEW/REVISED FIGURES**







Source: WCL, February 2003

Figure 3-5 Site Circulation Plan (Revised)



LISTING OF SIGNS BY REFERENCE NUMBER

- ① Entering Congested Traffic Area
- ② WEST COUNTY RESOURCE RECOVERY CENTER
- ③ Green Material ↑  
Wood Waste ↑  
← WCCSL Office  
Concrete & Asphalt ↑  
← Trash Rubbish
- ④ WCCSL Office
- ⑤ ← EXIT
- ⑥ Exit →  
← Green Material  
← Wood Waste  
← Compost  
← Mulch
- ⑦ ONE-WAY  
DO NOT ENTER
- ⑧ ONE-WAY  
DO NOT ENTER
- ⑨ STOP  
EXIT→
- ⑩ Authorized Vehicles  
Only
- ⑪ Use Caution When  
Backing Into Building
- ⑫ Watch For  
Moving Vehicles

Legend

- ⑩ = Flat side is the direction sign is facing  
← = Direction of vehicle traffic

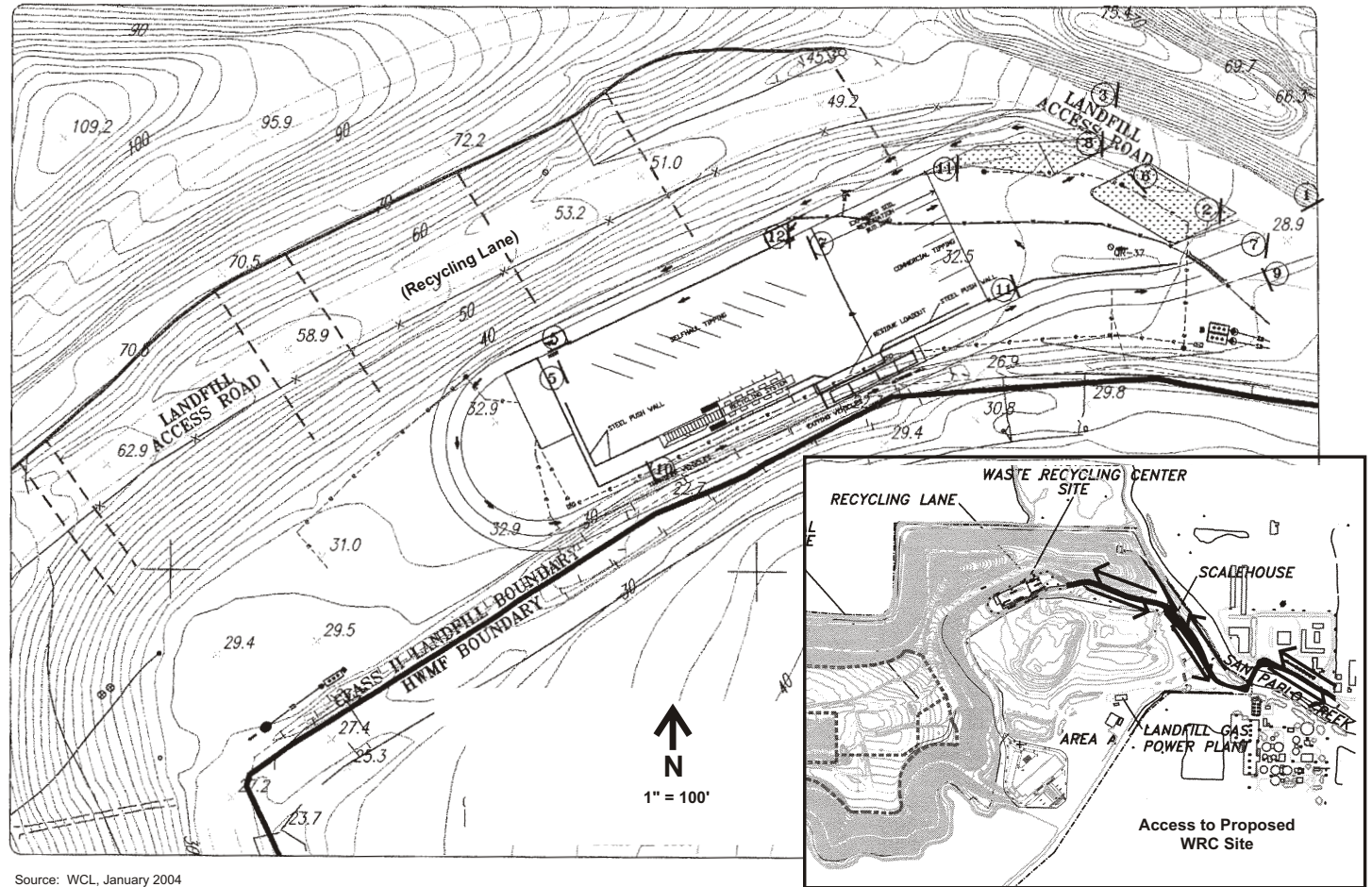
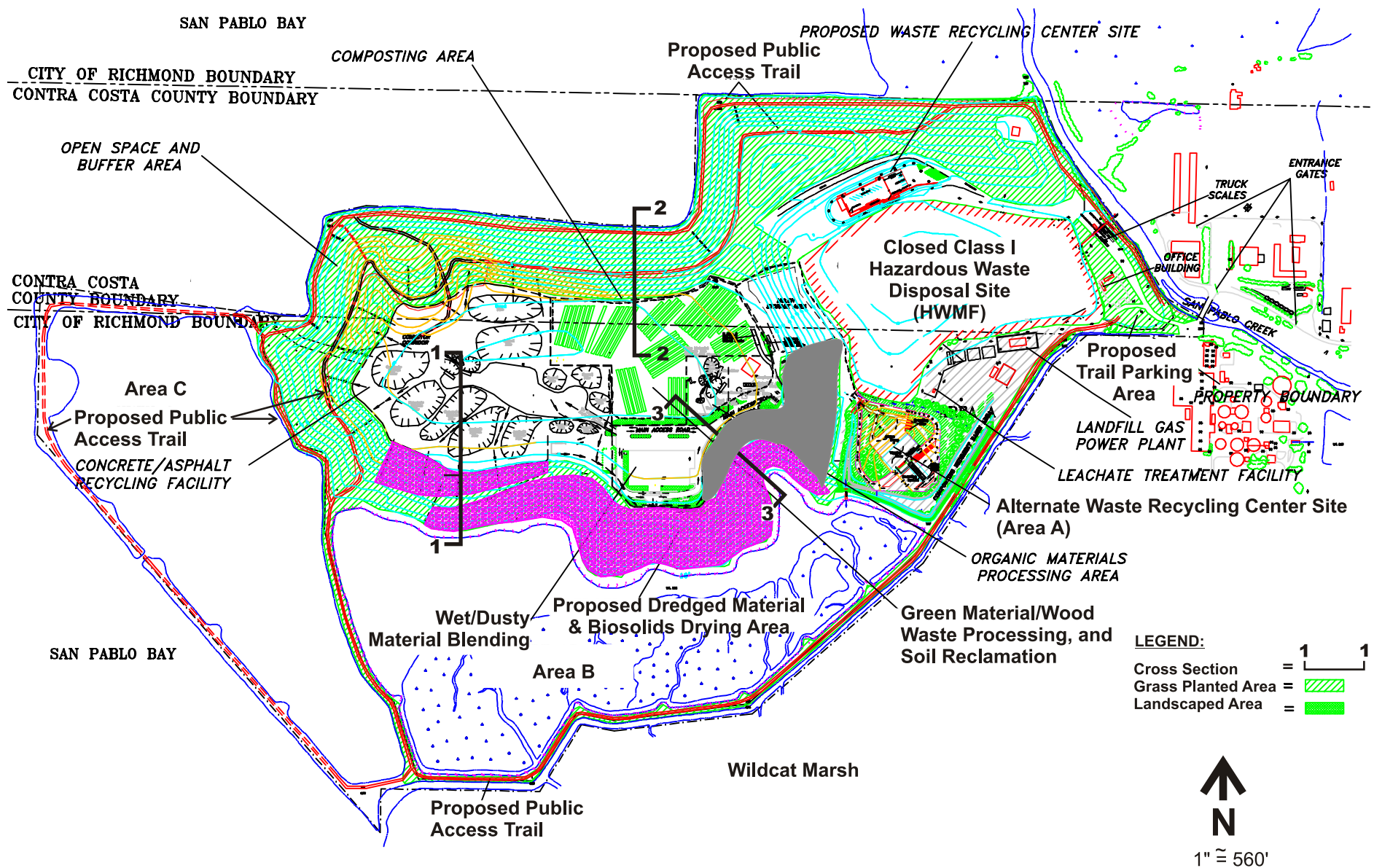


Figure 3-5A  
Proposed WRC Site Access and  
Circulation Plan (New)





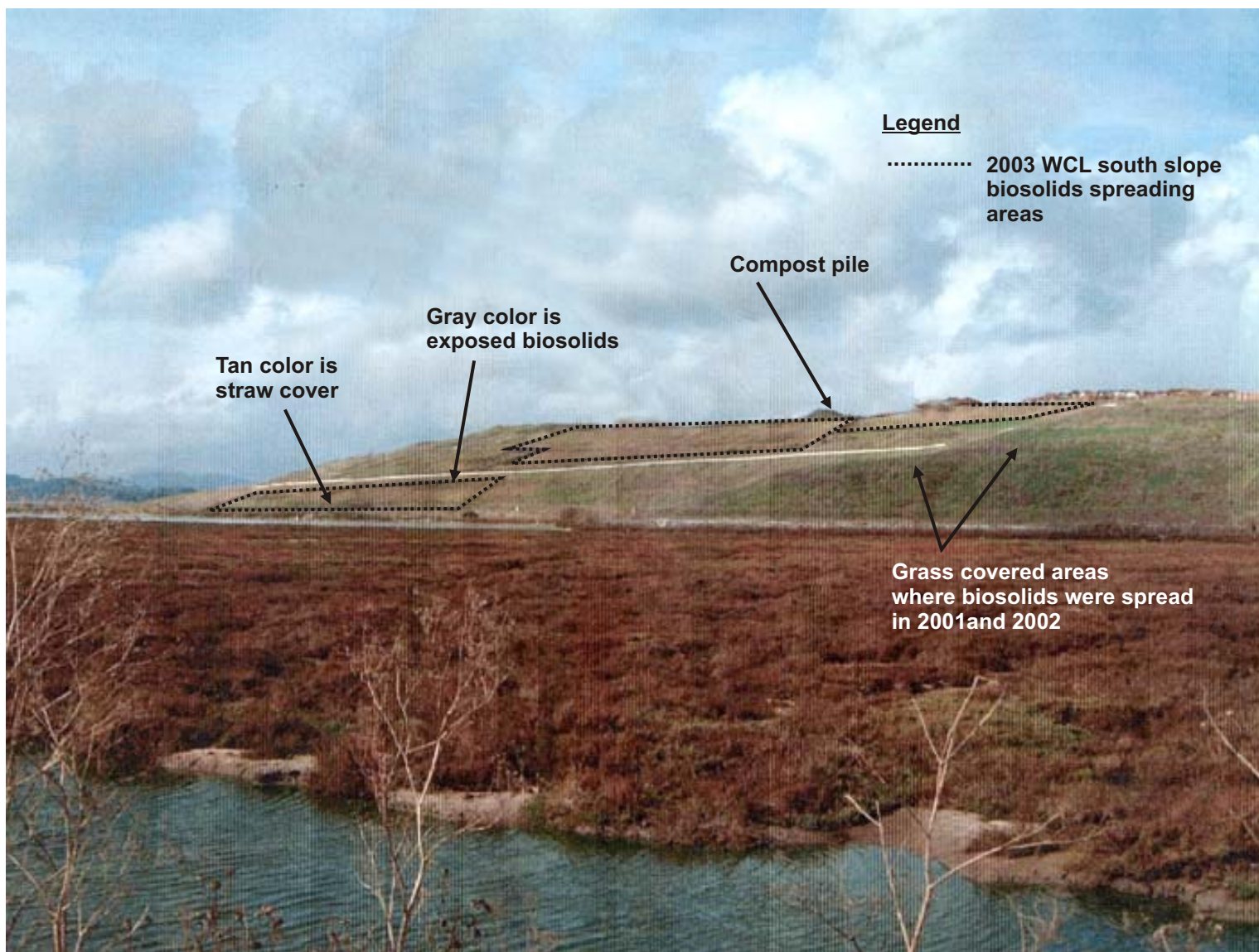
**Figure 5-3 Location of Slope Stability Cross Sections (Revised)**





Source: WCL, Inc., January 2004

**Figure 7A. Sideslope Areas Prior to Biosolids Application in March 2003 ( New)**



Source: WCL, Inc., December 2004

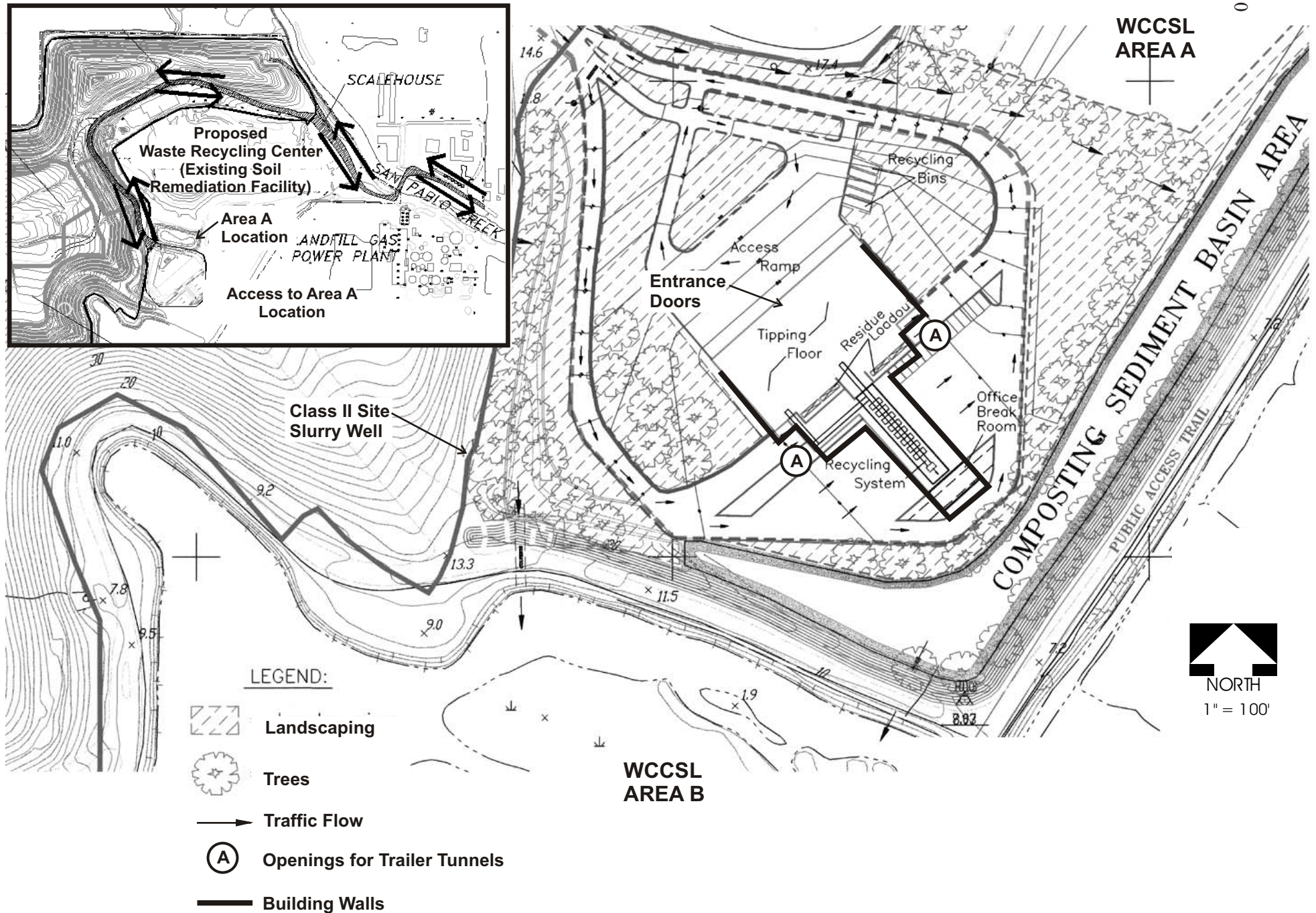
**Figure 7B. View of Sideslope Areas Following Summer and Fall 2003 Biosolids Application (New)**





**Figure 12-1 Noise Measurement Locations (New)**





**APPENDIX A**

**WCCSL WASTE ACCEPTANCE GUIDELINES  
(REVISED)**



**Republic Services**  
**West Contra Costa Sanitary Landfill**

**WASTE ACCEPTANCE GUIDELINES**  
**2004**

**ACCEPTANCE PROCEDURES**

The following information summarizes acceptance procedures for the West Contra Costa Sanitary Landfill (WCCSL):

- Assist in determining WCCSL required laboratory analysis (from this guide or contact WCCSL),
- Complete a "Special Waste Profile" (supplied by WCCSL),
- Submit completed Special Waste Profile, required analyses, Chain of Custody and other required documentation to WCCSL,
- Obtain approval from WCCSL. *Note:* more information may be required upon review of material,
- Set up method of payment prior to transport of material, and
- A Republic manifest will be generated upon approval and sent to transporter, each truck must have a manifest, signed by the Generator prior to arriving at the landfill. These manifests are utilized for tracking purposes when the shipment arrives at the landfill.

**ACCEPTANCE CRITERIA**

***Laboratory Analysis***

Petroleum Contaminated Soils

Product specific knowledge can be utilized to determine the appropriate analytical requirements for petroleum contaminated sites. Below is a list of petroleum hydrocarbons that are frequently released, and the analyses that will accurately and completely address the regulated compounds under CCR Title 22 and 40 CFR.

|                     |                                                            |
|---------------------|------------------------------------------------------------|
| Leaded Gas:         | TPH (8015M), BTEX (8020), Lead (TTLC)                      |
| Unleaded Gas:       | TPH, BTEX, with documentation of unleaded gas only on site |
| Kerosene:           | TPH (8015M), BTEX                                          |
| Jet Fuel:           | TPH (8015M), BTEX, Lead (if leaded product)                |
| Diesel:             | TPH (*), BTEX                                              |
| Used Hydraulic Oil: | TPH (*), BTEX, CAM 17                                      |
| Bunker Oil:         | TPH (*), BTEX, LUFT 5 Metals (or MSDS)                     |
| Virgin Motor Oil:   | TPH (*), BTEX, Semivolatiles (EPA 8270)                    |
| Used Motor Oil:     | TPH (*), BTEX, 8260, 8270, CAM 17                          |

\* Methods 8015 Modified, 1664, or 5520 are acceptable for TPH results

## Waste Acceptance Guidelines – 2004

The characteristics of reactivity, corrosivity, ignitability, and aquatic toxicity are unlikely in petroleum contaminated soils below certain TPH levels. Nevertheless, soils contaminated with concentrations in excess of those noted above (Diesel and heavy end hydrocarbons >15,000 ppm) will require the completion of the 96 hour Aquatic Toxicity Bioassay to demonstrate that the waste is non-hazardous. In certain instances, an RCI (Reactivity, Corrosivity, Ignitability) may also be necessary

### Solvent Contaminated Waste

- If contaminant is known, run the method which targets that contaminant
- If specific contaminant is unknown, run 8260
- Must address any RCRA listings (F or U codes), in writing
- Metals analyses and/or RCI may be requested depending on the source of the contaminant

### WWTP Sludges / Biosolids

- TTLC and STLC (Cam 17 metals and organics), TCLP as necessary,
- Volatile Organics (8260),
- Semivolatile Organics (8270),
- Pesticides / herbicides (8081),
- PCB's (8082),
- Percent moisture, and
- Cyanide (9010) and sulfide (376.1) (15% - Primary treatment, 20% - Secondary)

### Industrial Waste Streams

Utilizing the generator's description and knowledge of the waste stream, as well as accompanying analyses, the WCCSL will determine the required testing and frequency of sampling. In addition, the waste stream must not exhibit any of the characteristics of reactivity, corrosivity, ignitability, or toxicity.

## Frequency

Representative samples are typically required for all incoming waste streams. In general, a four point composite (four individual grab samples composited at a laboratory into one equally represented sample) is required to satisfy the requirements for a "representative" sample.

| CONTAMINANTS                                                                                               | PROTOCOL                                                                                                   |                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                            | Volume                                                                                                     | Frequency                                                                                                                                                                                |
| BTEX<br>Lead                                                                                               | 0-25 cu. yd.<br>25-150 cu. yd.<br>150-300 cu. yd.<br>300-750 cu. yd.<br>750-1500 cu. yd.<br>1500 + cu. yd. | One Grab Sample<br>4 Point Composite<br>4 Point Composite per 150 cu. yd.<br>4 Point Composite per 250 cu. yd.<br>4 Point Composite per 500 cu. yd.<br>4 Point Composite per 750 cu. yd. |
| Petroleum Hydrocarbons<br>(8015M, 418.1, 5520)                                                             | 0-600 cu. yd.<br>600-1500 cu. yd.<br>1500 + cu. yd.                                                        | 4 Point Composite<br>Two 4 Point Composites<br>4 Point Composite per 1500 cu. yd.                                                                                                        |
| VOC's (8260)<br>SVOC's (8270)<br>Pesticides (8080)<br>Herbicides (8150)<br>Metals (CAM 17)<br>PCB's (8080) | 0-1000 cu. yd.<br>1000-2000 cu. yd.<br>2000 + cu. yd.                                                      | 4 Point Composite per 500 cu. yd.<br>Two 4 Point Composites<br>4 Point Composite per 2000 cu. yd.                                                                                        |
| Treated Wood analysis:<br>8270, Benzene,<br>TTLC CAM 17 metals                                             | any volume                                                                                                 | 4 Point Composite per 500 cu. yd.                                                                                                                                                        |

## Analytical Review

The following should be considered when submitting data from a California accredited independent laboratory to the WCCSL for review:

- The analytical data must be less than 18 months old when received by the WCCSL.
- The analytical report must be legible, typed on the laboratory letterhead, and include the address and phone number of the laboratory. No draft or preliminary reports will be acceptable.
- The results must have units of measure identified.
- For results reported as "non detect," a detection or reporting level must be indicated. Laboratory detection limits must be less than regulatory thresholds.
- Incomplete or inconsistent data may result in a request for new, or additional, analytical information. Examples of inconsistencies are:
  - Required holding times not met,
  - Required spike recoveries not reported (QA/QC reports), and
  - Chain of custody documentation unavailable.

**Republic Services  
West Contra Costa Sanitary Landfill**

## **WASTE ACCEPTANCE GUIDELINES**

### **2004**

#### **Petroleum Contaminated Soils Constituent Limits**

|                                                                                                     |                                                    |
|-----------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Total Petroleum Hydrocarbons (gasoline):                                                            | 50 ppm (limited by BAAQMD)                         |
| Total Petroleum Hydrocarbons (Diesel):<br>(also includes Motor, Hydraulic, Heating and Bunker Oils) | No limit<br>(Aquatic Toxicity needed > 15,000 ppm) |

| TPH impacted soils are also limited by: | TCLP<br>(mg/L) | TTL (Total)<br>(mg/Kg) |
|-----------------------------------------|----------------|------------------------|
| Benzene                                 | 0.50           | 10.0                   |
| Toluene                                 | n/a*           | 50                     |
| Ethylbenzene                            | n/a            | 50                     |
| Xylenes                                 | n/a            | 50                     |
| Lead                                    | 5.0            | 350.0                  |

\*Not Applicable

#### **Metals Constituent Limits**

| Metal      | TTL (mg/Kg) | Concentration<br>STL (mg/L) | TCLP (mg/L) |
|------------|-------------|-----------------------------|-------------|
| Antimony   | 500.0       | 15.0                        |             |
| Arsenic    | 500.0       | 5.0                         | 5.0         |
| Barium     | 10,000      | 100.0                       | 100.0       |
| Beryllium  | 75          | 0.75                        |             |
| Cadmium    | 100         | 1.0                         | 1.0         |
| Chromium   | 500         | 5.0                         | 5.0         |
| Cobalt     | 8,000       | 80.0                        |             |
| Copper     | 2,500       | 25.0                        |             |
| Fluoride   | 18,000      | 180                         |             |
| Lead       | 350         | 5.0                         | 5.0         |
| Mercury    | 20          | 0.2                         | 0.2         |
| Molybdenum | 3,500       | 350.0                       |             |
| Nickel     | 2,000       | 20.0                        |             |
| Selenium   | 100         | 1.0                         | 1.0         |
| Silver     | 500         | 5.0                         | 5.0         |
| Thallium   | 700         | 7.0                         |             |
| Vanadium   | 2,400       | 24.0                        |             |
| Zinc       | 5,000       | 250.0                       |             |

## **Hazardous Organic Constituent Limits**

| Constituent               | Concentration |            |             |
|---------------------------|---------------|------------|-------------|
|                           | TTL (mg/L)    | STL (mg/L) | TCLP (mg/L) |
| Aldrin                    | 1.4           | 0.14       | n/a         |
| Benzene                   |               |            | 0.5         |
| Carbon Tetrachloride      |               |            | 0.5         |
| Chlordane                 | 2.5           | 0.25       | 0.03        |
| Chlorobenzene             |               |            | 100.0       |
| Chloroform                |               |            | 6.0         |
| Cresols                   |               |            | 200.0       |
| 2,4 D                     | 100.0         | 10.0       | 10.0        |
| DDT, DDE, DDD             | 1.0           | 0.10       | n/a         |
| 1,4 Dichlorobenzene       |               |            | 7.5         |
| 1,2 Dichloroethane        |               |            | 0.5         |
| 1,1 Dichloroethylene      |               |            | 0.7         |
| 2,4 Dinitrotoluene        |               |            | 0.13        |
| Dieldrin                  | 8.0           | 0.8        | n/a         |
| Dioxin                    | 0.01          | 0.001      | n/a         |
| Endrin                    | 0.2           | 0.02       | 0.02        |
| Heptachlor                | 4.7           | 0.47       | 0.008       |
| Hexachlorobenzene         |               |            | 0.13        |
| Hexachlorobutadiene       |               |            | 0.5         |
| Hexachloroethane          |               |            | 3.0         |
| Kepone                    | 21.0          | 2.1        | n/a         |
| Lindane                   | 4.0           | 0.4        | 0.4         |
| Methoxychlor              | 100.0         | 10.0       | 10.0        |
| Methyl Ethyl Ketone       |               |            | 200.0       |
| Mirex                     | 21.0          | 2.1        | n/a         |
| Nitrobenzene              |               |            | 2.0         |
| Pentachlorophenol         | 17.0          | 1.7        | 100.0       |
| Polychlorinated Biphenyls | 50.0          | 5.0        | n/a         |
| Pyridine                  |               |            | 5.0         |
| Tetrachloroethylene       |               |            | 0.7         |
| Toxaphene                 | 5.0           | 0.5        | 0.5         |
| Trichloroethylene         | 2040          | 204.0      | 0.5         |
| 2,4,5 TP (Silvex)         | 10.0          | 1.0        | 1.0         |
| 2,4,5 Trichlorophenol     |               |            | 400.0       |
| 2,4,6 Trichlorophenol     |               |            | 2.0         |
| Vinyl Chloride            |               |            | 0.2         |

## Other Limits:

### Moisture:

- > 15% from Primary Wastewater Treatment Facilities,
- > 20% from Secondary Wastewater Treatment Facilities, or
- > 50% all other sources.

### Toxicity:

- Oral LD50 > 5,000 mg/kg,
- Acute Dermal LD50 > 4,300 mg/kg,
- Acute Inhalation LC50 > 10,000 ppm, or
- Acute Aquatic Toxicity > 500 ppm.

### Ignitability:

- Flash point > 60° C, or 140° F.

### Corrosivity:

- pH between 2.0 and 12.5.

### Asbestos:

- < 1.0 percent asbestos.

Must Contains less than 0.001 percent by weight of any of the following substances:

- 2- Acetylaminofluorine;
- Acrylonitrile;
- 4-Aminodiphenyl;
- Benzidine and its salts;
- bis (chloromethyl) ether (BCME);
- Methyl chloromethyl Ether;
- 1,2-Dibromo-3-chloropropane (DBCP);
- 3,3'-Dichlorobenzidine and its salts (DCB);
- 4-Dimethylaminoazobenzene (DAB);
- Ethyleneimine (EL);
- alpha-Naphthylamine (1-NA);
- beta-Naphthylamine (2-NA);
- 4-Nitrobiphenyl (4-NBP);
- N-Nitrosodimethylamine (DMN);
- beta-propiolactone (BPL); or
- Vinyl Chloride.

## **CUSTOMER INSTRUCTIONS**



## CUSTOMER/GENERATOR PRE-ACCEPTANCE PROCEDURES

The following outlines the requirements necessary for approval and acceptance of a waste to be managed by a Republic Services, Inc. company. Please evaluate these criteria in light of your particular material and/or waste generating process. Bear in mind that these criteria are intended to serve as a guide only, and that the requirements for your particular stream may differ.

The following must be completed prior to acceptance:

1. Special Waste Profile (See Instruction Sheet)
2. Pre-Approval Sampling, Analysis and Documentation Any special waste stream managed by a Republic Services, Inc. company must be accompanied by some form of characterization as to its chemical and physical nature. This may include one or more of the following:
  - The representative sampling of the material to be disposed of, followed by appropriate laboratory analysis as specified by the disposal facility representative.

All analytical results submitted for review should be accompanied by a completed chain-of-custody form and, if possible, documentation of proper preservation, holding times, and laboratory QA/QC. The sampling and analysis should demonstrate that the waste is not hazardous as defined by 40 CFR 261 (EPA) and the waste is acceptable for landfill disposal.

- A Material Safety Data Sheet (MSDS) for outdated or off-specification product which has not been subsequently contaminated.
- A letter from the generator or generator's agent describing a particular process or field knowledge useful in making a hazardous waste determination.
- A letter from the local regulatory agency or EPA authorizing the disposal of the waste in a sanitary landfill; or which supports the classification of the material in question.





## CUSTOMER/GENERATOR SPECIAL WASTE PROFILE

### General Instructions

This form is used to describe and characterize wastes offered for management and disposal by a Republic Services, Inc. company. Information on this form will be used to determine if a waste stream may be transported, treated, stored, or disposed of in a safe, legal and environmentally sound manner. Answers must be provided for in all sections of the form and should be typed or legibly printed in ink. A response of "none" or "n/a" or "n/d" (not determined) may be made if appropriate; however, be aware that such responses may require clarification and could delay approval.

Please attach Material Safety Data Sheets (MSDS), laboratory analysis, or other supporting documentation, which might expedite the review and approval of your waste. **Note: A completed Special Waste Profile alone is not sufficient for waste approval – supporting documentation is required.** Any questions concerning the proper completion of this form may be directed to your special waste sales representative.

#### A. Generator Information

1. Name of Company Generating the Waste
2. Address of Generator (to include city, state, county, and zip)
3. Site location of where waste is actually being generated
4. Name of generator contact
5. Phone number for generator contact
6. Fax number for generator contact

#### B. Customer/Billing Information

1. Enter the customer name in the space provided. This is the party to whom disposal costs will be charged. If the customer and the generator are the same, so indicate.
2. Enter the customer address. All billing information, invoices, and the manifest copies (if desired) will be sent to this address unless otherwise specified.
3. Enter the name of the individual responsible for the waste stream at the generating facility or a customer contact. This person should be familiar enough with the waste stream/generating process to answer specific questions about the waste.
4. Phone Number for the customer
5. Fax Number for the customer
6. Check whether a signed every customer is required to have a signed service agreement on file prior to shipment.

#### C. Transporter Information

1. Enter the name of the transporter who will be hauling the material to the landfill
2. Address of the transporter
3. Phone Number for the transporter
4. Fax Number for the transporter
5. Contact Name for the transporter

**D. Agent/Consultant Information**

1. Enter the name of the Agent/Consultant coordinating the project
2. Address of the Agent/Consultant
3. Phone Number for the Agent/Consultant
4. Fax Number for the Agent/Consultant
5. Contact Name for the Agent/Consultant
6. Check whether there is a Letter of Authorization on file. This letter authorizes the agent/consultant to sign for the generator.

**E. Waste Stream Information**

1. In the space marked "Common Name of Waste" enter a name that best describes the waste. This name may reflect the process by which the waste is generated (e.g. spent shot-blast dust) or it may be strictly descriptive (e.g. petroleum contaminated soil).
2. Give a brief description of the industrial process or circumstances (e.g. tank rupture, historical contamination) that resulted in the generation of the waste. If additional room is needed, please attach a separate page and reference it in the space provided.
3. Describe the physical state of the waste at 70°F
4. Describe the odor of the waste
5. Describe the color of the waste
6. Please indicate the flash point of the waste stream as given by MSDS or laboratory analysis (liquids only). Note: Liquids with a FP < 140° F will be considered characteristically hazardous due to ignitability (D001) and will not be considered for disposal.
7. Indicate whether or not the waste is reactive, as given by MSDS or laboratory analysis. The limits for reactive constituents are as follows: 500mg/kg (vapor) for sulfides (SW-846) and 250 mg/kg (vapor) for cyanides (SW-846 Method 9010). Note: Any wastes exceeding the aforementioned limits will be treated as a reactive waste and will not be considered for disposal.
8. If the waste is a liquid or contains free liquids (see 10 and 11 below) please specify a pH range for the material. Note: Liquids which have pH less than or equal to 2 or greater than or equal to 12.5 will be characteristically hazardous due to corrosivity (D002) and will not be considered for disposal.
9. Indicate whether or not the waste generates heat when it comes into contact with air or moisture.
10. Please indicate whether or not the waste contains free liquids.
11. Provide an estimate of the moisture (water) content.
12. Please indicate if the waste is or may be radioactive or regulated by the U.S. Department of Transportation.
13. Please indicate if the waste is or contains medical waste.
14. Please indicate if the waste is or may be a hazardous waste.

**F. Supplemental Information**

1. Indicate the nature of the supporting documentation you are providing in support of the Profile. This information should be attached to or faxed/mailed with the Profile to which it pertains. Please indicate the total number of pages accompanying the Profile. Profiles with significant supporting documentation or multiple Profiles requiring immediate attention should be overnighted to the appropriate address.
2. Please verify that a representative sample of the waste stream was collected if analytical data is provided.

**G. Shipping Information**

1. Please indicate how the waste will be packaged for disposal (e.g. bulk, drum, etc.)
2. Please indicate the volume expected
3. Please indicate the frequency of shipment
4. Specify which Landfill(s) you wish to utilize for disposal.
5. Please indicate which method of disposal will be used (e.g. Landfill, Solidification, etc.)

**H. Generator's Certification Statement**

Carefully review the certification statement near the bottom of the page. Please print the company name, your name, date, and sign. The Generator's Certification Statement must be signed before an application can be processed and approved.

\*Agent, in this context, is defined as one who assumes responsibility for payment, coordinates disposal, accurately and truthfully represents the waste offered for disposal, ensures that such waste conforms to the Profile, and in general (along with the generator) incurs potential liability associated with the management of the waste.

## **SPECIAL WASTE FORMS**

## FORM DESCRIPTIONS

The Plan calls for the use of forms to track the waste, to record data and more importantly, to verify that the material received at the RSI facility correctly matches the waste as characterized and certified by the generator. The documents referenced in the Plan are included and briefly described below. If possible these forms should be used as printed here. However, modifications may be necessary to meet permit, local or state regulations.

- **Special Waste Profile (Form SW01)**  
With this document, the generator provides information on the physical and chemical characterization of the waste. The generator certifies that the waste is non-hazardous, describes the source of all components of the process-generating waste and explains the process generating the waste. In addition, other pertinent information is requested (i.e. name, address, contact person, etc.). The instructions for completion of the form should also be provided to the customer.
- **Non-Hazardous Waste Manifest (Form SW02)**  
This form is used as a manifest for identifying the quantity, composition, origin, routing, and destination of waste during its transportation from the point of generation to the point of disposal.
- **Asbestos Waste Shipment Record (Form SW03)**  
This form is used as a manifest for identifying the quantity, composition, origin, routing, and destination of asbestos during its transportation from the point of generation to the point of disposal.
- **Special Waste Management Decision (Form SW04)**  
This document is an internal form used to inform the facility management that waste has been technically reviewed and is acceptable (or not acceptable) for disposal. Also, any precautions necessary to avoid potential injury or health problems to facility employees in the disposal process are included on this form. Technical conditions, precautions and limitations of disposal are included in this document.
- **Special Waste Update/Renewal Certification (Form SW05)**  
This form provides a means of renewing or updating an existing approved Special Waste Profile.
- **Special Waste Analytical Data Sheet (Form SW06)**  
This form provides documentation of a secondary physical screening of the special waste due to discrepancies in the initial screening prior to acceptance at the landfill.
- **Generator Knowledge Documentation for Disposal of Non-Hazardous Special Waste (Form SW07)**  
This form provides documentation from the generator of the special or industrial waste describing the process generating the waste. The generator must acknowledge that they are familiar with the process and the waste is non-hazardous.
- **Generator Knowledge Documentation for Disposal of Non-Hazardous Liquid Waste (Form SW08)**  
This form provides documentation from the generator of the liquid waste describing the process generating the waste. The generator must acknowledge that they are familiar with the process and the waste is non-hazardous.
- **Special Waste Service Agreement (Example)**  
This document creates a legally binding agreement between the two parties (the generator and RSI facility) which is subject to the terms and conditions set forth in the document.



Office Use Only

Approval Number: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

**SPECIAL WASTE PROFILE**

Information utilized for completion of this form must originate from an authorized representative of the generator of the waste material. The information on this form must be COMPLETE, LEGIBLE, and the form must be SIGNED.

**A. GENERATOR INFORMATION**

1. Generator Name: \_\_\_\_\_
2. Address: \_\_\_\_\_  
City: \_\_\_\_\_ County: \_\_\_\_\_  
State: \_\_\_\_\_ Zip: \_\_\_\_\_
3. Site Location (if different): \_\_\_\_\_
4. Contact Name: \_\_\_\_\_
5. Phone Number: \_\_\_\_\_
6. Fax Number: \_\_\_\_\_

**C. TRANSPORTER INFORMATION**

1. Name: \_\_\_\_\_
2. Street Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_
3. Phone Number: \_\_\_\_\_
4. Fax Number: \_\_\_\_\_
5. Contact Name: \_\_\_\_\_

**B. CUSTOMER/BILLING INFORMATION**

1. Billing Name: \_\_\_\_\_
2. Address: \_\_\_\_\_  
City: \_\_\_\_\_ County: \_\_\_\_\_  
State: \_\_\_\_\_ Zip: \_\_\_\_\_
3. Contact Name: \_\_\_\_\_
4. Phone Number: \_\_\_\_\_
5. Fax Number: \_\_\_\_\_
6. Is there a service agreement on file? ☐ YES ☐ NO

**D. AGENT/CONSULTANT INFORMATION**

1. Name: \_\_\_\_\_
2. Street Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_
3. Phone Number: \_\_\_\_\_
4. Fax Number: \_\_\_\_\_
5. Contact Name: \_\_\_\_\_
6. Is there a Letter of Authorization on file? ☐ YES ☐ NO

**E. WASTE STREAM INFORMATION**

1. Common Name of Waste: \_\_\_\_\_
2. Detailed Description of Process: \_\_\_\_\_
3. Physical State at 70°F ☐ Solid ☐ Semi-Solid ☐ Liquid ☐ Powder ☐ Other \_\_\_\_\_
4. Odor: ☐ None ☐ Mild ☐ Significant: (describe) \_\_\_\_\_
5. Color: \_\_\_\_\_
6. Flash Point: \_\_\_\_\_ ° F \_\_\_\_\_ ° C
7. Reactive: ☐ NO ☐ YES with \_\_\_\_\_
8. pH Range: \_\_\_\_\_
9. Heat Generating Waste ☐ NO ☐ YES
10. Free Liquid: ☐ NO ☐ YES
11. Water Content: \_\_\_\_\_ % by water
12. Does the waste contain radioactive or U.S.D.O.T. hazardous materials, PCB's, or asbestos? ☐ NO ☐ YES
13. Does the waste contain any etiological agents or untreated medical waste? ☐ NO ☐ YES
14. Is the waste proposed for management a hazardous waste as defined by Federal or State regulations? ☐ NO ☐ YES

**F. SUPPLEMENTAL INFORMATION**

1. Attached Document(s): ☐ None ☐ MSDS ☐ Certified Analytical Report ☐ Memo/Letter ☐ Process Knowledge
2. If analytical data is attached, is the data derived from testing a representative sample in accordance with 40 CFR 261 and/or other applicable laws? ☐ YES ☐ NO

**G. SHIPPING INFORMATION**

1. Packaging: ☐ Bulk Solids ☐ Bulk Liquids ☐ Drums ☐ Roll-Off ☐ Dump Truck ☐ Tank Truck ☐ Other: \_\_\_\_\_
2. Estimated Volume: \_\_\_\_\_ ☐ Tons ☐ Cubic Yards ☐ Drums ☐ Gallons ☐ Other: \_\_\_\_\_
3. Shipping Frequency: \_\_\_\_\_ per ☐ One Time ☐ Monthly ☐ Yearly ☐ Other: \_\_\_\_\_
4. Designated Landfill(s): \_\_\_\_\_
5. Disposal Method: ☐ Landfill ☐ Solidification ☐ Bioremediation ☐ Other: \_\_\_\_\_

**H. Generator's Certification Statement:**

I hereby certify that the above and attached information is complete and accurate to the best of my ability, that no deliberate information was omitted, that all known and suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by government or local authority, and does not contain PCB's regulated by TSCA or any other regulatory authority. If any of the above information changes, I agree to notify Republic Services prior to offering the waste for shipment or management.

I, \_\_\_\_\_ (NAME, PLEASE PRINT) am employed by  
\_\_\_\_\_ (COMPANY NAME) and am authorized to sign this request for  
\_\_\_\_\_.

COMPANY NAME: \_\_\_\_\_  
DATE: \_\_\_\_\_

PRINTED NAME: \_\_\_\_\_  
SIGNATURE: \_\_\_\_\_



## NON-HAZARDOUS WASTE MANIFEST

### GENERATOR INFORMATION

Generator Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ County: \_\_\_\_\_

State: \_\_\_\_\_ Zip: \_\_\_\_\_

Site Location (if different): \_\_\_\_\_

### CUSTOMER/BILLING INFORMATION

Billing Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ County: \_\_\_\_\_

State: \_\_\_\_\_ Zip: \_\_\_\_\_

| Republic Services<br>Approval # | Description of Waste | Volume/Weight | Expiration<br>Date | Container Type |
|---------------------------------|----------------------|---------------|--------------------|----------------|
|                                 |                      |               |                    |                |
|                                 |                      |               |                    |                |
|                                 |                      |               |                    |                |
|                                 |                      |               |                    |                |

\*Attach Additional Sheet if necessary

I hereby certify that the above described materials are non-hazardous wastes as defined by 40 CFR 261 or any applicable state law. Further, that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Generator/Authorized Agent Name

Signature

Date Shipped

### TRANSPORTER INFORMATION

Transporter Name: \_\_\_\_\_

DOT # \_\_\_\_\_

Address: \_\_\_\_\_

Truck Number: \_\_\_\_\_

Phone Number: \_\_\_\_\_

I certify no hazardous waste or other regulated substance was knowingly introduced to the waste while in my custody. The waste transported in this vehicle is the waste identified above, to the best of my knowledge.

Name of Authorized Agent

Signature

Date Delivered

### DISPOSAL SITE INFORMATION

Site Name: \_\_\_\_\_

Phone No. \_\_\_\_\_

Address: \_\_\_\_\_

I hereby acknowledge receipt of the above described materials

Name (Print or Type)

Signature

Form SW02 (2003)

Date Received

## Special Waste Management Decision

**I. Decision Request:** \_\_\_\_\_ Initial \_\_\_\_\_ Renewal \_\_\_\_\_ Amendment

Management Facility: \_\_\_\_\_

Intermediate Transfer Facility: \_\_\_\_\_

Generator Name: \_\_\_\_\_

Billing Name: \_\_\_\_\_

Address: \_\_\_\_\_

Address: \_\_\_\_\_

Contact: \_\_\_\_\_

Consultant Name: \_\_\_\_\_

Phone: \_\_\_\_\_

Consultant Phone: \_\_\_\_\_

Site Location: \_\_\_\_\_

Transporter Name: \_\_\_\_\_

Transporter Phone: \_\_\_\_\_

Waste Name: \_\_\_\_\_

Estimated Quantity: \_\_\_\_\_

**II. Special Waste Manager Decision:** \_\_\_\_\_ Approved \_\_\_\_\_ Disapproved

If disapproved, Explain: \_\_\_\_\_

Management Method(s): ☐ Landfill ☐ Solidification ☐ Bioremediation ☐ Other: \_\_\_\_\_

Precautions, Conditions or \_\_\_\_\_

Limitations on approval: \_\_\_\_\_

Approval Number: \_\_\_\_\_ Decision Expiration Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Attached Document(s): ☐ None ☐ MSDS ☐ Certified Analytical Report ☐ Memo/Letter  
☐ Process Knowledge

Special Waste Mgr. Signature: \_\_\_\_\_ Name(print): \_\_\_\_\_

Date: \_\_\_\_\_

**III. Facility Operations Acknowledge:** \_\_\_\_\_ Approved \_\_\_\_\_ Disapproved

State any additional \_\_\_\_\_

Precautions, conditions, \_\_\_\_\_

or limitations \_\_\_\_\_

Facility Mgr. Signature \_\_\_\_\_ Name(print): \_\_\_\_\_

Date: \_\_\_\_\_





## SPECIAL WASTE UPDATE/RENEWAL CERTIFICATION

### GENERATOR INFORMATION

1. Generator Name: \_\_\_\_\_
2. Address: \_\_\_\_\_  
City: \_\_\_\_\_ County: \_\_\_\_\_  
State: \_\_\_\_\_ Zip: \_\_\_\_\_
3. Site Location (if different): \_\_\_\_\_
4. Contact Name: \_\_\_\_\_
5. Phone Number: \_\_\_\_\_
6. Fax Number: \_\_\_\_\_

### CUSTOMER/BILLING INFORMATION

1. Billing Name: \_\_\_\_\_
2. Address: \_\_\_\_\_  
City: \_\_\_\_\_ County: \_\_\_\_\_  
State: \_\_\_\_\_ Zip: \_\_\_\_\_
3. Contact Name: \_\_\_\_\_
4. Phone Number: \_\_\_\_\_
5. Fax Number: \_\_\_\_\_
6. Is there a service agreement on file? ☐ YES ☐ NO

\*\*\*PLEASE UPDATE ANY INCORRECT INFORMATION\*\*\*

REPUBLIC APPROVAL NUMBER: \_\_\_\_\_

EXPIRATION DATE: \_\_\_\_\_

WASTE DESCRIPTION/NAME: \_\_\_\_\_

### SUPPLEMENTAL INFORMATION

1. Attached Document(s): ☐ None ☐ MSDS ☐ Certified Analytical Report ☐ Memo/Letter ☐ Process Knowledge
2. If analytical data is attached, is the data derived from testing a representative sample in accordance with 40 CFR 261 and/or other applicable laws? ☐ YES ☐ NO

### SHIPPING INFORMATION

1. Packaging: ☐ Bulk Solids ☐ Bulk Liquids ☐ Drums ☐ Roll-Off ☐ Dump Truck ☐ Tank Truck ☐ Other: \_\_\_\_\_
2. Estimated Volume: \_\_\_\_\_ ☐ Tons ☐ Cubic Yards ☐ Drums ☐ Gallons ☐ Other: \_\_\_\_\_
3. Shipping Frequency: \_\_\_\_\_ per ☐ One Time ☐ Monthly ☐ Yearly ☐ Other: \_\_\_\_\_
4. Designated Landfill(s): \_\_\_\_\_
5. Disposal Method: ☐ Landfill ☐ Solidification ☐ Bioremediation ☐ Other: \_\_\_\_\_

In the event the physical or chemical nature of the waste stream is altered/changed, the landfill must be immediately notified in writing, and new analytical must also be submitted.

### Certification Statement:

I hereby certify that the physical and chemical characteristics, as well as the process(es) generating the above named waste streams, have not changed since the previous approval.

COMPANY NAME: \_\_\_\_\_

DATE: \_\_\_\_\_

PRINTED NAME: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

**SPECIAL WASTE ANALYTICAL DATA SHEET**

Disposal Facility: \_\_\_\_\_ Approval Number \_\_\_\_\_

Generator's Name: \_\_\_\_\_

Address: \_\_\_\_\_

Common Name of Waste: \_\_\_\_\_

Hauling Company (transporter): \_\_\_\_\_

Contact's Name: \_\_\_\_\_

Contact's Phone Number: \_\_\_\_\_

---

**Physical Screening**

DO THE FOLLOWING OBSERVATIONS MATCH THE INFORMATION PROVIDED BY THE SPECIAL WASTE PROFILE (Form SW01) AND GENERATOR?

INDICATE YES OR NO FOR EACH OF THE FOLLOWING TESTS AND NOTE ANY DISCREPANCIES.

| <u>Test</u>    | <u>Yes</u> | <u>or</u> | <u>No</u> | <u>Comments and/or Observations:</u> |
|----------------|------------|-----------|-----------|--------------------------------------|
| Color          | _____      |           | _____     | _____                                |
| Odor           | _____      |           | _____     | _____                                |
| Physical State | _____      |           | _____     | _____                                |
| Free Liquids   | _____      |           | _____     | _____                                |

WASTE PASSED \_\_\_\_\_ ACCEPTED

WASTE FAILED \_\_\_\_\_ REJECTED

REASON(S) \_\_\_\_\_

IF WASTE FAILS ONE OR MORE OF THE PHYSICAL SCREENING TESTS, THE WASTE IS DEEMED UNACCEPTABLE FOR DISPOSAL AND SHOULD BE REJECTED.

\_\_\_\_\_  
SIGNATURE\_\_\_\_\_  
DATE\_\_\_\_\_  
FACILITY MANAGER'S SIGNATURE\_\_\_\_\_  
DATE

## GENERATOR KNOWLEDGE DOCUMENTATION FOR DISPOSAL OF NON-HAZARDOUS SPECIAL WASTE

Generator Name: \_\_\_\_\_

Waste Name: \_\_\_\_\_

Process Description: \_\_\_\_\_

\_\_\_\_\_

### Listed Hazardous Waste Determination

This material is not specified as a listed hazardous waste by EPA in 40 CFR 261 Subpart D. It does not meet the requirements of the F, K, P or U list.

### Characteristic Hazardous Waste Determination

**Ignitability:** This material is a waste that is not capable of causing a fire under normal conditions and has a flashpoint greater than 140 F. This waste is not considered an ignitable waste under 40 CFR 261.21. This waste will not generate heat that would adversely affect the structure of the landfill, or adversely affect the health or safety of workers or the public.

**Corrosivity:** Under 40 CFR 261.22, a waste is considered corrosive if it is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5. The waste may also be considered to be corrosive waste if it corrodes steel at a rate greater than 6.35 mm/year at 130 F. This material is a waste that has a pH greater than 2 and less than 12.5. Therefore, this material does not exhibit the characteristics of corrosivity as defined under 40 CFR 261.23.

**Reactivity:** This material is a solid waste that does not react violently or have the capability of generating heat when mixed with other wastes or water. Nor does this waste contain cyanide or sulfide and is therefore not considered a reactive waste under 40 CFR 261.33.

**Toxicity:** The technical information provided by the manufacturer for the process materials provides the chemical makeup to the nearest 0.01% by weight. None of the contaminants listed in 40 CFR 261.33 as Toxicity Characteristics in Table 1 are listed in the technical information supplied by the manufacturer. Due to the fact that none of these chemicals are present in this material, or are present in extremely low concentrations (<0.01% by weight), this process waste is considered non-hazardous.

**Polychlorinated Biphenyls (PCB's):** The technical information provided by the manufacturer for all materials in this process provides the chemical makeup of the material to the nearest 0.01% by weight. No PCB's have been listed on this information and therefore are in concentrations less than 0.01% by weight. Therefore, this material has concentrations of PCB's less than the regulatory limits specified under 40 CFR 761 and all applicable state regulations.

**Asbestos:** The waste stream generated does not come into contact with any materials containing asbestos.

**Free Liquids:** The process waste generated is solidified and/or dried before disposal at the landfill and would pass a paint filter test.

**This information is, to the best of my knowledge, true, accurate and complete.**

\_\_\_\_\_  
Generator Signature

Form SW07 (2003)

\_\_\_\_\_  
Date



## GENERATOR KNOWLEDGE DOCUMENTATION FOR DISPOSAL OF NON-HAZARDOUS LIQUID WASTE

Generator Name: \_\_\_\_\_

Waste Name: \_\_\_\_\_

Process Description: \_\_\_\_\_

\_\_\_\_\_

### Listed Hazardous Waste Determination

This material is not specified as a listed hazardous waste by EPA in 40 CFR 261 Subpart D. It does not meet the requirements of the F, K, P or U list.

### Characteristic Hazardous Waste Determination

**Ignitability:** This material is a waste that is not capable of causing a fire under normal conditions and has a flashpoint greater than 140 F. This waste is not considered an ignitable waste under 40 CFR 261.21. This waste will not generate heat that would adversely affect the structure of the landfill, or adversely affect the health or safety of workers or the public.

**Corrosivity:** Under 40 CFR 261.22, a waste is considered corrosive if it is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5. The waste may also be considered to be corrosive waste if it corrodes steel at a rate greater than 6.35 mm/year at 130 F. This material is a waste that has a pH greater than 2 and less than 12.5. Therefore, this material does not exhibit the characteristics of corrosivity as defined under 40 CFR 261.23.

**Reactivity:** This material is a solid waste that does not react violently or have the capability of generating heat when mixed with other wastes or water. Nor does this waste contain cyanide or sulfide and is therefore not considered a reactive waste under 40 CFR 261.33.

**Toxicity:** The technical information provided by the manufacturer for the process materials provides the chemical makeup to the nearest 0.01% by weight. None of the contaminants listed in 40 CFR 261.33 as Toxicity Characteristics in Table 1 are listed in the technical information supplied by the manufacturer. Due to the fact that none of these chemicals are present in this material, or are present in extremely low concentrations (<0.01% by weight), this process waste is considered non-hazardous.

**Polychlorinated Biphenyls (PCB's):** The technical information provided by the manufacturer for all materials in this process provides the chemical makeup of the material to the nearest 0.01% by weight. No PCB's have been listed on this information and therefore are in concentrations less than 0.01% by weight. Therefore, this material has concentrations of PCB's less than the regulatory limits specified under 40 CFR 761 and all applicable state regulations:

**This information is, to the best of my knowledge, true, accurate and complete.**

\_\_\_\_\_  
Generator Signature

\_\_\_\_\_  
Date



## SPECIAL WASTE SERVICE AGREEMENT NON-HAZARDOUS WASTES

RSI COMPANY:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

RSI Approval Number: \_\_\_\_\_

Project Name: \_\_\_\_\_

Broker ICC No.: \_\_\_\_\_

Tax I.D. No.: \_\_\_\_\_

GENERATOR:

Name: \_\_\_\_\_

Site Address: \_\_\_\_\_

Billing Address If Different From Site Address: \_\_\_\_\_

City: \_\_\_\_\_ Zip: \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_

State: \_\_\_\_\_ Zip: \_\_\_\_\_

County: \_\_\_\_\_

Contact: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

1. **Special Waste Service.** Subject to the terms and conditions contained herein, the Company and the Generator agree to be legally bound hereby and the Company agrees to accept at its Facility, Acceptable Waste (hereinafter referred to as "Special Waste" or "Waste") delivered by Generator, and which is acceptable to the Company as herein provided.
2. **Acceptable Waste.** Only those Special Wastes described in Paragraph 3 herein and in any Special Waste Profile(s) (each, an "Profile" and collectively, "Profiles") which number is identical to the RSI Approval Number referenced above, and which Profile(s) are hereby incorporated by reference herein, and which Waste is subsequently approved by the Company and is otherwise in accordance with all laws, regulations and permits, shall be acceptable for disposal at the Facility ("Acceptable Waste").
3. (A) **Rates for Disposal:**

| <u>Type of Waste</u> | <u>Estimated Daily Volume</u> | <u>Base Rate</u> | <u>Transportation Rate</u> |
|----------------------|-------------------------------|------------------|----------------------------|
| _____                | _____                         | _____            | _____                      |
| _____                | _____                         | _____            | _____                      |
| _____                | _____                         | _____            | _____                      |

Generator shall also be liable for all taxes, fees, or other charges imposed by federal, state, local or provincial laws and regulations.

County and State of Origin of Waste: \_\_\_\_\_

Estimated Total Volume: \_\_\_\_\_

Cannot Exceed Daily Volume of \_\_\_\_\_ Without Prior Approval of Company.

(B) **Incorporation by Reference.** In addition to Profiles, the following documents are incorporated by reference into this Agreement as if fully set forth herein.

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_

4.) **Term of Agreement.** This Agreement is effective for \_\_\_\_\_ months, commencing \_\_\_\_\_ and shall automatically be renewed for a similar term thereafter unless either party shall give written notice (via certified mail) of termination to the other party at least thirty (30) days prior written notice.

THE COMPANY AND THE GENERATOR, IN CONSIDERATION OF THE MUTUAL OBLIGATIONS CONTAINED HEREIN, AGREE THAT THIS IS A LEGALLY BINDING AGREEMENT WHICH IS SUBJECT TO THE TERMS AND CONDITIONS SET FORTH ON THIS PAGE AND ON THE REVERSE SIDE OF THIS DOCUMENT.

GENERATOR

COMPANY

\_\_\_\_\_  
SIGNATURE (AUTHORIZED REPRESENTATIVE)

\_\_\_\_\_  
SIGNATURE (AUTHORIZED REPRESENTATIVE)

\_\_\_\_\_  
NAME (PLEASE PRINT)

\_\_\_\_\_  
NAME (PLEASE PRINT)

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
DATE:

\_\_\_\_\_  
DATE:

# Terms and Conditions of Special Waste Service Agreement

5. The Agreement. This agreement of the parties ("Agreement") for the disposal of Special Waste shall consist of this Agreement, riders to the Agreement (if any) and any Application, permit and approval that may be applicable to such Waste.
6. Waste Accepted at Facility. Generator represents, warrants and covenants that the Waste delivered to Company at its Facility hereunder will be Acceptable Waste and will not contain any unacceptable quantity of hazardous materials or substances, radioactive materials or substances, or toxic waste or substances, as defined by applicable federal, state, local or provincial laws or regulations. Any Waste which does not meet these requirements shall hereinafter be referred to as "Unacceptable Waste". The Generator shall in all matters relating to the collection, transportation and disposal of the Waste hereunder, comply with all applicable federal, state and local laws, regulations, rules and orders regarding the same. The word "Facility" shall mean any landfill, transfer station or other location used to transfer, process or otherwise dispose of such Waste.
7. Special Waste. Generator represents, warrants and covenants that the Waste delivered to Company hereunder (i) will not contain any Special Waste that is not specifically described on any Application which is attached hereto or which is subsequently approved by the Company, (ii) will meet the material description as set forth in any Application and otherwise in all significant respects and (iii) will not contain Unacceptable Waste. The parties may incorporate additional Special Waste as part of this Agreement if prior to delivery of such Waste to Company, Generator has provided an Application for such Waste and Company has approved disposal of such Waste within the limitations and conditions contained in Company's written notice of approval of Special Waste Disposal. Title to any and all Waste handled or disposed of by Company shall at all times remain with Generator and Broker (if a Broker is involved).
8. Rights of Refusal/Rejection. The Generator shall inspect all Waste at the place(s) of collection and shall remove any and all Unacceptable Waste. Company has the right to refuse, or to reject after acceptance, any load(s) of Waste(s) delivered to its Facility including if the Company believes the Generator has breached (or is breaching) its representations, warranties, covenants or agreements hereunder, or any applicable federal, state or local laws, regulations, rules or orders, even if only a portion of such Waste load is unacceptable. The Company shall have the right to inspect all vehicles and containers of Waste haulers, including the Generator's vehicles, in order to determine whether the Waste is Acceptable Waste or Unacceptable Waste pursuant to this Agreement and all applicable federal, state and local laws, rules and regulations. The Company's exercise, or failure to exercise, its rights hereunder shall not operate to relieve the Generator of its responsibilities or liability under this Agreement. The Generator shall be responsible for, and bear all reasonable expenses and damages incurred by the Company, as a result of the Unacceptable Waste and in the reloading and removal of Unacceptable Waste disposed in the Facility. The Company, may also, in its sole discretion, require the Generator to promptly remove the Unacceptable Waste.
9. Limited License to Enter. This Agreement provides Generator with a license to enter the Facility for the limited purpose of, and only to the extent necessary for, off-loading Acceptable Waste at the Facility in the manner directed by Company. Except in an emergency, Generator's personnel shall not leave the immediate vicinity of their vehicle. After off-loading the Waste, Generator's personnel shall promptly leave the Facility. Under no circumstances shall Generator or its personnel engage in any scavenging of Waste or other materials at the Facility. The Company reserves the right to make and enforce reasonable rules and regulations concerning the operation of the Facility, the conduct of the drivers and others on the Facility premises, quantities and sources of Waste, and any other matters necessary or desirable for the safe, legal and efficient operation of the Facility including, but not limited to, speed limits on haul roads imposed by the Company, and the wearing of hard hats and other personal protection equipment by all individuals allowed on the Facility premises. Generator agrees to conform to such rules and regulations as they may be established and amended from time to time. Company may refuse to accept Waste from and shall deny an entrance license to, any of Generator's personnel whom Company believes is under the influence of alcohol or other chemical substances. Generator shall be solely responsible for its employees and subcontractors performing their obligations in a safe manner when at the facility of Company.
10. Charges and Payment. Payment shall be made by Generator within ten (10) days after receipt of invoice from Company. In the event that any amount is overdue, the Company may terminate this Agreement. Generator agrees to pay a finance charge equal to the maximum interest rate permitted by law. Generator shall be liable for all taxes, fees, or other charges imposed upon the disposal of the Waste by federal, state, local or provincial laws and regulations. Company, from time to time, may modify its rates upon thirty (30) days written notice to Generator.
11. Termination. Generator's obligations, representations, warranties and covenants regarding the Waste delivered and all indemnities shall survive termination of this Agreement. Should Generator materially default in any of its obligations hereunder, then Company may immediately terminate this Agreement and Generator shall be liable for all costs and damages incurred by the Company.
12. Driver's Knowledge and Authority. Generator represents, warrants and covenants that its drivers who deliver Waste to Company's Facility have been advised by Generator of the Company's prohibition on deliveries of hazardous materials or substances, radioactive materials or substances, or toxic waste or substances or any other Unacceptable Waste to the Facility of Company's restrictions on deliveries of Special Waste to the Facility, of the definitions of "Hazardous Waste and Hazardous Substances" as provided by applicable federal, state and local law, rules and regulations and "Special Waste" as provided herein, and of the terms of this license to enter Company's Facility.
13. Indemnification. Generator shall indemnify, defend and hold harmless the Company and its subsidiaries, affiliates and parent corporations, as applicable and their respective officers, directors, lenders, employees, subcontractors and agents from and against any and all claims, suits, losses, liabilities, assessments, damages, fines, costs and expenses, including reasonable attorneys fees arising under federal, state or local laws, regulations or ordinances, or relating to the content of the Waste, or arising out of or in connection with any breach of this Agreement or arising out of the negligent collection, transportation and disposal of Waste by Generator or Generator's employees, agents, subcontractors or representatives thereof. Generator shall also be responsible for increased inspection, testing, study and analysis costs made necessary due to reasonable concerns of the Company as to the content of the Waste following discovery of potentially Unacceptable Waste. This indemnification and other obligations stated in this paragraph shall survive the termination of this Agreement.
14. Insurance. Generator shall maintain in full force and effect throughout the term of this Agreement the following types of insurance in at least the amounts specified below:

| Coverages             | Minimum Amounts of Insurance    |
|-----------------------|---------------------------------|
| Worker's Compensation | Statutory                       |
| General Liability     | \$500,000 combined single limit |
| Automobile Liability  | \$500,000 combined single limit |

All insurance will be by Insurers authorized to do business in the state in which the Facility is located. Prior to Generator being allowed on Facility premises, Generator shall provide the Company with certificates of insurance or other satisfactory evidence that such insurance

GENERATOR: \_\_\_\_\_

COMPANY: \_\_\_\_\_



**BROKER SPECIAL WASTE  
SERVICE AGREEMENT  
NON-HAZARDOUS WASTES**

RSI COMPANY:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

GENERATOR:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BROKER:

Name: \_\_\_\_\_

Site Address: \_\_\_\_\_

City: \_\_\_\_\_ Zip: \_\_\_\_\_

State: \_\_\_\_\_

County: \_\_\_\_\_

Contact: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

RSI Approval Number: \_\_\_\_\_

Project Name: \_\_\_\_\_

Broker ICC No.: \_\_\_\_\_

Tax I.D. No.: \_\_\_\_\_

Billing Address If Different From Site Address: \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

1. **Special Waste Disposal.** Subject to the terms and conditions contained herein, the Company and the Broker agree to be legally bound hereby and the Company agrees to accept at its Facility, Acceptable Waste (hereinafter referred to as "Special Waste" or "Waste") delivered by Broker, and which is acceptable to the Company as herein provided.
2. **Acceptable Waste.** Only those Special Wastes described in Paragraph 3 herein and in any Special Waste Profile (each, a "Profile" and collectively, "Profiles") which number is identical to the RSI Approval Number referenced above, and which Profile(s) are hereby incorporated by reference herein, and which Waste is subsequently approved by the Company and is otherwise in accordance with all laws, regulations and permits, shall be acceptable for disposal at the Facility ("Acceptable Waste").
3. (A) **Rates for Disposal:**

| <u>Type of Waste</u> | <u>Estimated Daily Volume</u> | <u>Base Rate</u> | <u>Transportation Rate</u> |
|----------------------|-------------------------------|------------------|----------------------------|
| _____                | _____                         | _____            | _____                      |
| _____                | _____                         | _____            | _____                      |
| _____                | _____                         | _____            | _____                      |

Broker shall also be liable for all taxes, fees, or other charges imposed by federal, state, local or provincial laws and regulations.

County and State of Origin of Waste: \_\_\_\_\_

Estimated Total Volume: \_\_\_\_\_

Cannot Exceed Daily Volume of \_\_\_\_\_ Without Prior Approval of Company.

(B) **Incorporation by Reference.** In addition to the Profiles, the following documents are incorporated by reference into this Agreement as if fully set forth herein.

1) \_\_\_\_\_

2) \_\_\_\_\_

3) \_\_\_\_\_

4.) **Term of Agreement.** This Agreement is effective for \_\_\_\_\_ months, commencing \_\_\_\_\_ and shall automatically be renewed for a similar term thereafter unless either party shall give written notice (via certified mail) of termination to the other party at least thirty (30) days prior written notice.

THE COMPANY AND THE BROKER, IN CONSIDERATION OF THE MUTUAL OBLIGATIONS CONTAINED HEREIN, AGREE THAT THIS IS A LEGALLY BINDING AGREEMENT WHICH IS SUBJECT TO THE TERMS AND CONDITIONS SET FORTH ON THIS PAGE AND ON THE REVERSE SIDE OF THIS DOCUMENT.

BROKER

COMPANY

\_\_\_\_\_  
SIGNATURE (AUTHORIZED REPRESENTATIVE)

\_\_\_\_\_  
SIGNATURE (AUTHORIZED REPRESENTATIVE)

\_\_\_\_\_  
NAME (PLEASE PRINT)

\_\_\_\_\_  
NAME (PLEASE PRINT)

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
DATE:

\_\_\_\_\_  
DATE:

# Terms and Conditions of Broker Special Waste Service Agreement

5. The Agreement. This agreement of the parties ("Agreement") for the disposal of Special Waste shall consist of this Agreement, riders to the Agreement (if any) and any Application, permit and approval that may be applicable to such Waste.
6. Waste Accepted at Facility. Broker represents, warrants and covenants that the Waste delivered to Company at its Facility hereunder will be Acceptable Waste and will not contain any unacceptable quantity of hazardous materials or substances, radioactive materials or substances, or toxic waste or substances, as defined by applicable federal, state, local or provincial laws or regulations. Any Waste which does not meet these requirements shall hereinafter be referred to as "Unacceptable Waste". The Broker shall in all matters relating to the collection, transportation and disposal of the Waste hereunder, comply with all applicable federal, state and local laws, regulations, rules and orders regarding the same. The word "Facility" shall mean any landfill, transfer station or other location used to transfer, process or otherwise dispose of such Waste.
7. Special Waste. Broker represents, warrants and covenants that the Waste delivered to Company hereunder (i) will not contain any Special Waste that is not specifically described on any Application which is attached hereto and which is subsequently approved by the Company, (ii) will meet the material description as set forth in any Application and otherwise in all significant respects and (iii) will not contain Unacceptable Waste. The parties may incorporate additional Special Waste as part of this Agreement if prior to delivery of such Waste to Company, Broker has provided an Application for such Waste and Company has approved disposal of such Waste within the limitations and conditions contained in Company's written notice of approval of Special Waste. Title to any and all Waste handled or disposed of by Company shall at all times remain with Generator and Broker.
8. Rights of Refusal/Rejection. The Broker shall inspect all Waste at the place(s) of collection and shall remove any and all Unacceptable Waste. Company has the right to refuse, or to reject after acceptance, any load(s) of Waste(s) delivered to its Facility including if the Company believes the Broker has breached (or is breaching) its representations, warranties, covenants or agreements hereunder, or any applicable federal, state or local laws, regulations, rules or orders, even if only a portion of such Waste load is unacceptable. The Company shall have the right to inspect all vehicles of Waste haulers, including the Broker's vehicles, in order to determine whether the Waste is Acceptable Waste or Unacceptable Waste pursuant to this Agreement and all applicable federal, state and local laws, rules and regulations. The Company's exercise, or failure to exercise, its rights hereunder shall not operate to relieve the Broker of its responsibilities or liability under this Agreement. The Broker shall be responsible for, and bear all reasonable expenses and damages incurred by the Company, as a result of the Unacceptable Waste and in the reloading and removal of Unacceptable Waste disposed in the Facility. The Company, may also, in its sole discretion, require the Broker to promptly remove the Unacceptable Waste.
9. Limited License to Enter. This Agreement provides Broker with a license to enter the Facility for the limited purpose of, and only to the extent necessary for, off-loading Acceptable Waste at the Facility in the manner directed by Company. Except in an emergency, Broker's personnel shall not leave the immediate vicinity of their vehicle. After off-loading the Waste, Broker's personnel shall promptly leave the Facility. Under no circumstances shall Broker or its personnel engage in any scavenging of Waste or other materials at the Facility. The Company reserves the right to make and enforce reasonable rules and regulations concerning the operation of the Facility, the conduct of the drivers and others on the Facility premises, quantities and sources of Waste, and any other matters necessary or desirable for the safe, legal and efficient operation of the Facility including, but not limited to, speed limits on haul roads imposed by the Company, and the wearing of hard hats and other personal protection equipment by all individuals allowed on the Facility premises. Broker agrees to conform to such rules and regulations as they may be established and amended from time to time. Company may refuse to accept Waste from and shall deny an entrance license to, any of Broker's personnel whom Company believes is under the influence of alcohol or other chemical substances. Broker shall be solely responsible for its employees and subcontractors performing their obligations in a safe manner when at the facility of Company.
10. Charges and Payment. Payment shall be made by Broker within ten (10) days after receipt of invoice from Company. In the event that any amount is overdue, the Company may terminate this Agreement. Broker agrees to pay a finance charge equal to the maximum interest rate permitted by law. Broker shall be liable for all taxes, fees, or other charges imposed upon the disposal of the Waste by federal, state, local or provincial laws and regulations. Company, from time to time, may modify its rates upon thirty (30) days written notice to Broker. Broker hereby agrees that the Company's right to receive payments under this Agreement is unconditional and is not conditioned upon Broker first receiving payment from Generator or any other party.
11. Termination. Broker's obligations, representations, warranties and covenants regarding the Waste delivered and all indemnities shall survive termination of this Agreement. Should Broker materially default in any of its obligations hereunder, then Company may immediately terminate this Agreement and Broker shall be liable for all costs and damages incurred by the Company.
12. Driver's Knowledge and Authority. Broker represents, warrants and covenants that its drivers who deliver Waste to Company's Facility have been advised by Broker of the Company's prohibition on deliveries of hazardous materials or substances, radioactive materials or substances, or toxic waste or substances or any other Unacceptable Waste to the Facility, of Company's restrictions on deliveries of Special Waste to the Facility of the definitions of "Hazardous Waste and Hazardous Substances" as provided by applicable federal, state and local law, rules and regulations and "Special Waste" as provided herein, and of the terms of this license to enter Company's Facility.
13. Indemnification. Broker shall indemnify, defend and hold harmless the Company and its subsidiaries, affiliates and parent corporations, as applicable and their respective officers, directors, lenders, employees, subcontractors and agents from and against any and all claims, suits, losses, liabilities, assessments, damages, fines, costs and expenses, including reasonable attorneys fees arising under federal, state or local laws, regulations or ordinances, or relating to the content of the Waste, or arising out of or in connection with any breach of this Agreement or arising out of the negligent collection, transportation and disposal of Waste by Broker or Broker's employees, agents, subcontractors or representatives thereof. Broker shall also be responsible for increased inspection, testing, study and analysis costs made necessary due to reasonable concerns of the Company as to the content of the Waste following discovery of potentially Unacceptable Waste. This indemnification and other obligations stated in this paragraph shall survive the termination of this Agreement.
14. Insurance. Broker shall maintain in full force and effect throughout the term of this Agreement the following types of insurance in at least the amounts specified below:

| Coverages             | Minimum Amounts of Insurance    |
|-----------------------|---------------------------------|
| Worker's Compensation | Statutory                       |
| General Liability     | \$500,000 combined single limit |
| Automobile Liability  | \$500,000 combined single limit |

All insurance will be by insurers authorized to do business in the state in which the Facility is located. Prior to Broker being allowed on Facility premises, Broker shall provide the Company with certificates of insurance or other satisfactory evidence that such insurance

BROKER: \_\_\_\_\_ COMPANY: \_\_\_\_\_



**APPENDIX B**

**DRAFT EIR APPENDIX 10A**

**SPREADSHEETS FOR CALCULATION  
OF PROCESS EMISSIONS (REVISED)**

### **WCCSL Air Quality Assumptions**

- Future emissions from the collection and combustion of landfill gas would be proportional to BAAQMD estimates of existing emissions factored proportionally to anticipated gas production in 2008 and 2015 as estimated by the applicant.
- BAAQMD estimates of existing emissions from equipment used in the concrete/asphalt recycling and composting operations could be factored up to reflect the increased annual throughputs for the operations.
- Emissions from the soil reclamation and wet waste/dusty materials operations could be calculated using BAAQMD emission factors for soil handling.
- Existing and future emissions from various mobile equipment and vehicles used on the site would be proportional to estimated hours of use multiplied by California Air Resources Board estimates of emission rates. Equipment/vehicle usage in 2008 was based on operation of the Waste Recycling Center at 85% and other BMPC operations at 75% of capacity.
- The population of equipment and vehicles in use on the site would be similar to the state-wide population of similar equipment and vehicles in 2003, 2008 and 2015.
- Daily VMT was estimated using estimated daily trip generation and assumed average one-way trip length of 10 miles for collection trucks, 20 miles for other large trucks, 10 miles for self haulers and 15 for all other vehicles. On-road emissions associated with project vehicle use were calculated using EMFAC-2002 emission factors and estimated vehicle miles traveled (VMT) for each vehicle classification. Trips to the Potrero Hills landfill were assumed to generate an additional 40 miles VMT per trip. A re-entrained road dust PM<sub>10</sub> emission factor of 0.427 grams per mile was assumed in addition to exhaust emissions.
- Fugitive emissions could be conservatively estimated using an emission factor for construction sites from the operation of vehicles and equipment on unpaved areas. BAAQMD's required dust control practices were assumed to be 75% efficient in controlling emissions. Overall acreages of the composting and concrete/asphalt operations in 2003 and 2015 were multiplied by the emission factor to estimate emissions. Emissions from this source in 2008 were taken as 75% of the emission at full capacity in 2015.

Spreadsheet to Calculate Emissions from Equipment/Vehicles

Scenario:

Existing 2003

| Equipment/Vehicle   | Emission Factors (Pounds/day) |       |       | Daily Hours |            | Daily Emission (Pounds/Day) |      |       |       |
|---------------------|-------------------------------|-------|-------|-------------|------------|-----------------------------|------|-------|-------|
|                     | ROG                           | NOx   | CO    | PM10        | Ann. Hours | ROG                         | NOx  | CO    | PM10  |
| Campactor           | 1.84                          | 16.4  | 11.6  | 0.74        | 16         | 5824                        | 3.7  | 32.8  | 23.2  |
| Crawler Tractor     | 1.45                          | 12.93 | 9.14  | 0.59        | 22         | 6136                        | 4.0  | 35.6  | 25.1  |
| Rubber-Tired Loader | 1.35                          | 8.23  | 11.52 | 0.3         | 46         | 13208                       | 7.8  | 47.3  | 66.2  |
| Motor Grader        | 1.76                          | 16.4  | 11.6  | 0.74        | 4          | 1040                        | 0.9  | 8.2   | 5.8   |
| Utility Tractor     | 0.65                          | 5.8   | 4.1   | 0.26        | 6          | 1560                        | 0.5  | 4.4   | 3.1   |
| Off Road Trucks     | 3.6                           | 25.96 | 27.44 | 1.06        | 42         | 10920                       | 18.9 | 136.3 | 144.1 |
|                     |                               |       |       |             |            |                             | 35.7 | 264.5 | 267.5 |
|                     |                               |       |       |             |            |                             |      |       | 11.0  |

Annual Emissions (Tons)

|  | Annual Emissions (Tons) |       |       |
|--|-------------------------|-------|-------|
|  | ROG                     | NOx   | CO    |
|  | 5.4                     | 47.8  | 33.8  |
|  | 4.4                     | 39.7  | 28.0  |
|  | 8.9                     | 54.4  | 76.1  |
|  | 0.9                     | 8.5   | 6.0   |
|  | 0.5                     | 4.5   | 3.2   |
|  | 19.7                    | 141.7 | 149.8 |
|  | 39.8                    | 296.6 | 297.0 |
|  |                         |       | 12.3  |

Spreadsheet to Calculate Emissions from Equipment/Vehicles

Scenario: Project 2008

| Equipment/Vehicle   | Emission Factors (Pounds/day) |       |       | Daily Hours |            | Daily Emission (Pounds/Day) |      |       |       |
|---------------------|-------------------------------|-------|-------|-------------|------------|-----------------------------|------|-------|-------|
|                     | ROG                           | NOx   | CO    | PM10        | Ann. Hours | ROG                         | NOx  | CO    | PM10  |
| Campactor           | 1.84                          | 12.74 | 14.14 | 0.44        | 0          | 0                           | 0.0  | 0.0   | 0.0   |
| Crawler Tractor     | 1.45                          | 10.04 | 11.15 | 0.51        | 0          | 0                           | 0.0  | 0.0   | 0.0   |
| Rubber-Tired Loader | 1.35                          | 7.86  | 11.52 | 0.22        | 46.4       | 13707.2                     | 7.8  | 45.6  | 66.8  |
| Motor Grader        | 1.76                          | 10.22 | 14.98 | 0.28        | 1.7        | 442                         | 0.4  | 2.2   | 3.2   |
| Utility Tractor     | 0.65                          | 4.5   | 5     | 0.16        | 5.1        | 1326                        | 0.4  | 2.9   | 3.2   |
| Off Road Trucks     | 3.6                           | 20.89 | 30.62 | 0.58        | 35.7       | 9282                        | 16.1 | 93.2  | 136.6 |
|                     |                               |       |       |             |            |                             | 24.7 | 143.9 | 209.8 |
|                     |                               |       |       |             |            |                             |      |       | 4.0   |

Annual Emissions (Tons)

|  | ROG  | NOx   | CO    | PM10 |
|--|------|-------|-------|------|
|  | 0.0  | 0.0   | 0.0   | 0.0  |
|  | 0.0  | 0.0   | 0.0   | 0.0  |
|  | 9.3  | 53.9  | 79.0  | 1.5  |
|  | 0.4  | 2.3   | 3.3   | 0.1  |
|  | 0.4  | 3.0   | 3.3   | 0.1  |
|  | 16.7 | 97.0  | 142.1 | 2.7  |
|  | 26.8 | 156.1 | 227.7 | 4.4  |

Spreadsheet to Calculate Emissions from Equipment/Vehicles

Scenario:

Project 2015

| Equipment/Vehicle   | Emission Factors (Pounds/day) |              |              | Daily Hours | Ann. Hours  | Daily Emission (Pounds/Day) |             |             |              |
|---------------------|-------------------------------|--------------|--------------|-------------|-------------|-----------------------------|-------------|-------------|--------------|
|                     | ROG                           | NOx          | CO           |             |             | ROG                         | NOx         | CO          | PM10         |
| Campactor           | 1.84                          | 11.37        | 15.16        | 0.34        | 0           | 0                           | 0.0         | 0.0         | 0.0          |
| Crawler Tractor     | 1.45                          | 8.96         | 11.95        | 0.27        | 0           | 0                           | 0.0         | 0.0         | 0.0          |
| Rubber-Tired Loader | 1.35                          | 7.86         | 11.52        | 0.22        | 46.4        | 17680                       | 7.8         | 45.6        | 66.8         |
| Motor Grader        | 1.76                          | 10.22        | 14.98        | 0.28        | 1.7         | 520                         | 0.4         | 2.2         | 3.2          |
| Utility Tractor     | 0.65                          | 4.02         | 5.36         | 0.12        | 5.1         | 1560                        | 0.4         | 2.6         | 3.4          |
| Off Road Trucks     | <u>3.6</u>                    | <u>20.89</u> | <u>30.62</u> | <u>0.58</u> | <u>35.7</u> | <u>10920</u>                | <u>16.1</u> | <u>93.2</u> | <u>136.6</u> |
|                     |                               |              |              |             |             | 24.7                        | 143.5       | 210.1       | 4.0          |

Annual Emissions (Tons)

|  | ROG  | NOx   | CO    | PM10 |
|--|------|-------|-------|------|
|  | 0.0  | 0.0   | 0.0   | 0.0  |
|  | 0.0  | 0.0   | 0.0   | 0.0  |
|  | 11.9 | 69.5  | 101.8 | 1.9  |
|  | 0.5  | 2.7   | 3.9   | 0.1  |
|  | 0.5  | 3.1   | 4.2   | 0.1  |
|  | 19.7 | 114.1 | 167.2 | 3.2  |
|  | 32.6 | 189.3 | 277.1 | 5.3  |

Spreadsheet to Calculate Vehicular Emissions

|                     |                                |       |                           |       |       |
|---------------------|--------------------------------|-------|---------------------------|-------|-------|
| Project:            | West Contra Costa              |       |                           |       |       |
| YEAR:               | 2003                           |       |                           |       |       |
| <b>Diesel Truck</b> | Emissions Factors (grams/mile) |       |                           |       |       |
|                     | VMT:                           | 11000 | ROG                       | NOX   | PM10  |
|                     |                                |       | 0.517                     | 13.75 | 0.321 |
|                     |                                |       |                           |       |       |
| <b>LDT</b>          | Emissions Factors (grams/mile) |       |                           |       |       |
|                     | VMT:                           | 8500  | ROG                       | NOX   | PM10  |
|                     |                                |       | 0.867                     | 1.051 | 0.039 |
|                     |                                |       |                           |       |       |
| <b>LDA</b>          | Emissions Factors (grams/mile) |       |                           |       |       |
|                     | VMT:                           | 9300  | ROG                       | NOX   | PM10  |
|                     |                                |       | 0.766                     | 0.674 | 0.032 |
|                     |                                |       |                           |       |       |
| Total               |                                |       | 44.5                      | 366.6 | 9.2   |
|                     |                                |       |                           |       |       |
|                     |                                |       | DAILY EMISSIONS (LBS/DAY) |       |       |
|                     |                                |       | ROG                       | NOX   | PM10  |
|                     |                                |       | 12.5                      | 333.1 | 7.8   |
|                     |                                |       |                           |       |       |
|                     |                                |       | DAILY EMISSIONS (LBS/DAY) |       |       |
|                     |                                |       | ROG                       | NOX   | PM10  |
|                     |                                |       | 16.2                      | 19.7  | 0.7   |
|                     |                                |       |                           |       |       |
|                     |                                |       | DAILY EMISSIONS (LBS/DAY) |       |       |
|                     |                                |       | ROG                       | NOX   | PM10  |
|                     |                                |       | 15.7                      | 13.8  | 0.7   |

Spreadsheet to Calculate Vehicular Emissions

|                           |                                |       |       |       |  |
|---------------------------|--------------------------------|-------|-------|-------|--|
| Project:                  | West Contra Costa              |       |       |       |  |
| YEAR:                     | 2008                           |       |       |       |  |
| Diesel Truck              | Emissions Factors (grams/mile) |       |       |       |  |
|                           | 16060                          | ROG   | NOX   | PM10  |  |
|                           | VMT:                           | 0.496 | 12.25 | 0.293 |  |
|                           |                                |       |       |       |  |
| LDT                       | Emissions Factors (grams/mile) |       |       |       |  |
|                           | 12400                          | ROG   | NOX   | PM10  |  |
|                           | VMT:                           | 0.617 | 0.658 | 0.041 |  |
|                           |                                |       |       |       |  |
| LDA                       | Emissions Factors (grams/mile) |       |       |       |  |
|                           | 6900                           | ROG   | NOX   | PM10  |  |
|                           | VMT:                           | 0.443 | 0.382 | 0.033 |  |
|                           |                                |       |       |       |  |
| DAILY EMISSIONS (LBS/DAY) |                                | ROG   | NOX   | PM10  |  |
|                           |                                | 17.5  | 433.3 | 10.4  |  |
|                           |                                |       |       |       |  |
| DAILY EMISSIONS (LBS/DAY) |                                | ROG   | NOX   | PM10  |  |
|                           |                                | 16.9  | 18.0  | 1.1   |  |
|                           |                                |       |       |       |  |
| DAILY EMISSIONS (LBS/DAY) |                                | ROG   | NOX   | PM10  |  |
|                           |                                | 6.7   | 5.8   | 0.5   |  |
|                           |                                |       |       |       |  |
| Total                     |                                | 41.1  | 457.1 | 12.0  |  |

Spreadsheet to Calculate Vehicular Emissions

Project: West Contra Costa  
YEAR: 2015

**Diesel Truck**

| Emissions Factors (grams/mile) |       |       |      |       |
|--------------------------------|-------|-------|------|-------|
| VT:                            | 21160 | ROG   | NOX  | PM10  |
|                                |       | 0.309 | 5.79 | 0.187 |

| DAILY EMISSIONS (LBS/DAY) |      |       |      |     |
|---------------------------|------|-------|------|-----|
| ROG                       |      | NOX   | PM10 |     |
|                           | 14.4 | 269.9 |      | 8.7 |

**LDT**

| Emissions Factors (grams/mile) |       |       |       |        |
|--------------------------------|-------|-------|-------|--------|
| VT:                            | 14800 | ROG   | NOX   | PM10   |
|                                |       | 0.375 | 0.345 | 0.0424 |

| DAILY EMISSIONS (LBS/DAY) |      |      |      |     |
|---------------------------|------|------|------|-----|
| ROG                       |      | NOX  | PM10 |     |
|                           | 12.2 | 11.2 |      | 1.4 |

**LDA**

| Emissions Factors (grams/mile) |      |       |       |       |
|--------------------------------|------|-------|-------|-------|
| VT:                            | 8700 | ROG   | NOX   | PM10  |
|                                |      | 0.217 | 0.178 | 0.033 |

| DAILY EMISSIONS (LBS/DAY) |     |     |      |     |
|---------------------------|-----|-----|------|-----|
| ROG                       |     | NOX | PM10 |     |
|                           | 4.2 | 3.4 |      | 0.6 |

|       |      |       |  |      |
|-------|------|-------|--|------|
| Total | 30.8 | 284.5 |  | 10.7 |
|-------|------|-------|--|------|



### Spreadsheet to Calculate Process Emissions

| Sources                     | Existing |      |       |       | 2008  |      |       |        | 2015 |      |       |        |
|-----------------------------|----------|------|-------|-------|-------|------|-------|--------|------|------|-------|--------|
|                             | ORG      | NOx  | CO    | PM    | ORG   | NOx  | CO    | PM     | ORG  | NOx  | CO    | PM     |
| Landfill Operation:         |          |      |       |       |       |      |       |        |      |      |       |        |
| Landfill/Gas Collection     | 0.2      | 0.0  |       | 0.0   | 144.0 | 0.1  | 0.0   | 0.0    | 0.0  | 0.1  | 0.0   | 0.0    |
| Landfill Gas Combustion     | 9.0      | 57.1 | 326.0 | 9.0   | 8.2   | 52.0 | 297.0 | 8.2    | 5.3  | 34.0 | 194.1 | 0.0    |
|                             |          |      |       |       |       |      |       |        |      |      |       | 5.4    |
| Concrete/Asphalt Recycling: |          |      |       |       |       |      |       |        |      |      |       |        |
| Concrete Crusher            | 0.0      | 0.0  |       | 0.0   | 5.0   | 0.0  | 0.0   | 62.3   | 0.0  | 0.0  | 0.0   | 83.0   |
| Asphalt Crusher             | 0.0      | 0.0  |       | 0.0   | 5.0   | 0.0  | 0.0   | 62.3   | 0.0  | 0.0  | 0.0   | 83.0   |
| Concrete Screen             | 0.0      | 0.0  |       | 0.0   | 13.0  | 0.0  | 0.0   | 162.0  | 0.0  | 0.0  | 0.0   | 215.8  |
| Concrete/Asphalt Storage    | 0.0      | 0.0  |       | 0.0   | 61.0  | 0.0  | 0.0   | 760.1  | 0.0  | 0.0  | 0.0   | 1012.6 |
| Composting Operation:       |          |      |       |       |       |      |       |        |      |      |       |        |
| Wood Shredder               | 0.0      | 0.0  |       | 0.0   | 52.0  | 0.0  | 0.0   | 218.4  | 0.0  | 0.0  | 0.0   | 291.2  |
| Wood Waste Screener         | 0.0      | 0.0  |       | 0.0   | 20.0  | 0.0  | 0.0   | 84.0   | 0.0  | 0.0  | 0.0   | 352.8  |
| Soil Reclamation Operation: |          |      |       |       |       |      |       |        |      |      |       |        |
| Soil Handling               | 0        | 0    |       | 0     | 0     | 0    | 0     | 4.2    | 0    | 0    | 0     | 6      |
| Wet Waste/Dusty Material:   |          |      |       |       |       |      |       |        |      |      |       |        |
| Material Handling           | 0        | 0    |       | 0     | 0     | 0    | 0     | 17     | 0    | 0    | 0     | 22.6   |
|                             |          |      |       |       |       |      |       |        |      |      |       |        |
|                             | 9.1      | 57.1 | 326.0 | 309.0 | 8.3   | 52.0 | 297.0 | 1378.4 | 5.4  | 34.0 | 194.1 | 2072.4 |

| S#          | Source Description                         | Annual Average lbs/day |      |      |      |     |
|-------------|--------------------------------------------|------------------------|------|------|------|-----|
|             |                                            | PART                   | ORG  | NOX  | SO2  | CO  |
| 5           | Waukesha Lean Burn Engine, 975 KW          | 5                      | 5.04 | 32.1 | -    | 183 |
| 6           | Waukesha Lean Burn Engine, 975 KW          | 4                      | 3.92 | 25   | -    | 143 |
| 15          | Landfill with Methane Wells & Collection S | 144                    | .16  | -    | -    | -   |
| 21          | Oil Collection Tank                        | -                      | -    | -    | -    | -   |
| 22          | Primary Oil/Water Separator, TK-2          | -                      | -    | -    | -    | -   |
| 23          | SECONDARY OIL/WATER SEPARATOR              | -                      | -    | -    | -    | -   |
| 24          | Load Equalization Tank, TK-7               | -                      | -    | -    | -    | -   |
| 25          | Photo-Oxidizer Tank, TK-5                  | -                      | -    | -    | -    | -   |
| 26          | Neutralization Tank, TK-9                  | -                      | -    | -    | -    | -   |
| 27          | First Stage Clarifier, TK-8                | -                      | -    | -    | -    | -   |
| 28          | Air Stripper Sump                          | -                      | -    | -    | -    | -   |
| 29          | Floculation/Mixing Tank, TK-8A             | -                      | -    | -    | -    | -   |
| 30          | Air Stripper                               | -                      | -    | -    | -    | -   |
| 31          | Bio Reactor Sump                           | -                      | -    | -    | -    | -   |
| 32          | Bio Reactor                                | -                      | -    | -    | -    | -   |
| 33          | Second Stage Clarifier                     | -                      | -    | -    | -    | -   |
| 34          | Treated Leachate Storage Tank              | -                      | -    | -    | -    | -   |
| 35          | Treated Leachate Storage Tank              | -                      | -    | -    | -    | -   |
| 36          | Treated Leachate Storage Tank              | -                      | -    | -    | -    | -   |
| 37          | Landfill Gas IC                            | -                      | -    | -    | 7.68 | -   |
| 38          | Secondary Oil/Water Separator, TK-4        | -                      | -    | -    | -    | -   |
| 39          | Sludge Storage Tank, TK-3                  | -                      | -    | -    | -    | -   |
| 40          | Equalization Tank, TK-1                    | -                      | -    | -    | -    | -   |
| 3           | Landfill Gas Standby Flare                 | -                      | -    | -    | -    | -   |
| T O T A L S |                                            | 152                    | 9.13 | 57   | 7.68 | 326 |

\*\* PLANT TOTALS FOR EACH EMITTED TOXIC POLLUTANT \*\*

| Pollutant Name         | Emissions lbs/day |
|------------------------|-------------------|
| Benzene                | .03               |
| Toluene                | .33               |
| Trichloroethylene      | .02               |
| Xylene                 | .25               |
| Ethyl benzene          | .17               |
| Vinyl chloride         | .02               |
| Hydrogen Sulfide (H2S) | .08               |

| S#          | Source Description                     | Annual Average lbs/day |     |     |     | CO |
|-------------|----------------------------------------|------------------------|-----|-----|-----|----|
|             |                                        | PART                   | ORG | NOx | SO2 |    |
| 11          | Concrete Crusher                       | 5                      | -   | -   | -   | -  |
| 12          | Crushed Concrete Screener              | 13                     | -   | -   | -   | -  |
| 13          | Concrete/Asphalt Storage Piles         | 61                     | -   | -   | -   | -  |
| 14          | Conveyors (Crushed Concrete)           | 0                      | -   | -   | -   | -  |
| 15          | Wood/Yard Waste Shredder (Tub Grinder) | -                      | -   | -   | -   | -  |
| 16          | Wood Waste Screener                    | 20                     | -   | -   | -   | -  |
| 17          | Composting Operation                   | -                      | -   | -   | -   | -  |
| 18          | Crushing of asphalt debris             | 5                      | -   | -   | -   | -  |
| T O T A L S |                                        | 105                    |     |     |     |    |

Bay Area Air Quality  
Management District

\*\* SOURCE EMISSIONS \*\*

PLANT #12667  
Jun 20, 2001

| S#          | Source Description       | Annual Average lbs/day |     |     |     | CO |
|-------------|--------------------------|------------------------|-----|-----|-----|----|
|             |                          | PART                   | ORG | NOx | SO2 |    |
| 1           | Thermal Rotary Vaporizer | -                      | -   | 22  | 1   | 3  |
| 2           | Soil Stockpiles          | 1                      | 2   | -   | -   | -  |
| 3           | Soil Handling Operations | 1                      | 1   | -   | -   | -  |
| 6           | Soil Screening Device    | 8                      | 10  | -   | -   | -  |
| T O T A L S |                          | 10                     | 13  | 22  | 1   | 3  |

\*\* PLANT TOTALS FOR EACH EMITTED TOXIC POLLUTANT \*\*

| Pollutant Name | Emissions lbs/day |
|----------------|-------------------|
| Benzene        | .98               |

**APPENDIX C**  
**VEHICLE TRIP CALCULATIONS (NEW)**

1/27/03

**SUMMARY OF BULK MATERIALS PROCESSING CENTER VEHICLE TRIPS**

| <b>BASELINE CONDITIONS (2003)</b> | Total Current<br>Project<br>Traffic | Collection<br>Trucks | Other<br>Large<br>Trucks | Self-Haul<br>Vehicles | Other     |
|-----------------------------------|-------------------------------------|----------------------|--------------------------|-----------------------|-----------|
| Solid Waste Landfilling           | 1260                                | I                    |                          |                       | 60        |
| Waste Recycling Center            | 0                                   | N                    |                          |                       | 0         |
| Composting                        | 302                                 | C                    |                          |                       | 6         |
| Soil Reclamation                  | 38                                  | L                    |                          |                       | 8         |
| Concrete/Asphalt Processing       | 108                                 | U                    |                          |                       | 8         |
| Landfill Cover Soil               | 350                                 | D                    |                          |                       | 0         |
| Wood Waste Recovery               | 0                                   | E                    |                          |                       | 0         |
| Soil Reclamation                  | 0                                   | D                    |                          |                       | 0         |
| Wet Wastes/Powdery Mtls Proc.     | 0                                   |                      |                          |                       | 0         |
| <b>TOTALS</b>                     | <b>2058</b>                         | <b>0</b>             | <b>0</b>                 | <b>0</b>              | <b>82</b> |

"Other" includes employee vehicles

| <b>POST-LF CONDITIONS 2007</b><br><i>assumes WRC at 85% cap. &amp;<br/>other BMPC operations at 75%</i> | Total<br>Project<br>Traffic | Collection<br>Trucks | Other<br>Large<br>Trucks | Self-Haul<br>Vehicles | Other     |
|---------------------------------------------------------------------------------------------------------|-----------------------------|----------------------|--------------------------|-----------------------|-----------|
| Solid Waste Landfilling                                                                                 | 0                           | 0                    | 0                        | 0                     | 0         |
| Waste Recycling Center                                                                                  | 1450                        | 182                  | 100                      | 1134                  | 34        |
| Composting                                                                                              | 435                         | 32                   | 41                       | 353                   | 11        |
| Soil Reclamation                                                                                        | 0                           | 0                    | 0                        | 0                     | 0         |
| Concrete/Asphalt Processing                                                                             | 324                         | 0                    | 285                      | 27                    | 12        |
| Landfill Cover Soil                                                                                     | 0                           | 0                    | 0                        | 0                     | 0         |
| Wood Waste Recovery                                                                                     | 182                         | 44                   | 48                       | 86                    | 5         |
| Soil Reclamation                                                                                        | 131                         | 0                    | 113                      | 17                    | 2         |
| Wet Wastes/Powdery Mtls Proc.                                                                           | 60                          | 0                    | 57                       | 0                     | 3         |
| <b>TOTALS</b>                                                                                           | <b>2581</b>                 | <b>257</b>           | <b>643</b>               | <b>1615</b>           | <b>66</b> |

"Other" includes employee vehicles

| <b>POST-LF CONDITIONS 2015</b><br><i>assumes WRC at 100% cap. &amp;<br/>other BMPC operations at 100%</i> | Total<br>Project<br>Traffic | Collection<br>Trucks | Other<br>Large<br>Trucks | Self-Haul<br>Vehicles | Other     |
|-----------------------------------------------------------------------------------------------------------|-----------------------------|----------------------|--------------------------|-----------------------|-----------|
| Solid Waste Landfilling                                                                                   | 0                           | 0                    | 0                        | 0                     | 0         |
| Waste Recycling Center                                                                                    | 1706                        | 214                  | 118                      | 1334                  | 40        |
| Composting                                                                                                | 580                         | 42                   | 54                       | 470                   | 14        |
| Soil Reclamation                                                                                          | 0                           | 0                    | 0                        | 0                     | 0         |
| Concrete/Asphalt Processing                                                                               | 432                         | 0                    | 380                      | 36                    | 16        |
| Landfill Cover Soil                                                                                       | 0                           | 0                    | 0                        | 0                     | 0         |
| Wood Waste Recovery                                                                                       | 242                         | 58                   | 64                       | 114                   | 6         |
| Soil Reclamation                                                                                          | 174                         | 0                    | 150                      | 22                    | 2         |
| Wet Wastes/Powdery Mtls Proc.                                                                             | 80                          | 0                    | 76                       | 0                     | 4         |
| <b>TOTALS</b>                                                                                             | <b>3214</b>                 | <b>314</b>           | <b>842</b>               | <b>1976</b>           | <b>82</b> |

"Other" includes employee vehicles

## WASTE RECYCLING CENTER (WRC)

1/13/03

|                                           |        |                     |
|-------------------------------------------|--------|---------------------|
| Assumed Average Amount of Wastes Received | 1000   | tons per day (TPD7) |
| Annual Tonnage                            | 365000 | TPY                 |

### WRC Traffic Total (incoming)

|                                | Density<br>lbs/CY | Load Size<br>Tons | Percentage<br>of total | Annual<br>Tons | Avg<br>TPD7 |
|--------------------------------|-------------------|-------------------|------------------------|----------------|-------------|
| Self Haul Vehicles             | 300               | 0.45              | 30                     | 109500         | 300         |
| Packer Collection Route Trucks |                   | 8                 | 55                     | 200750         | 550         |
| Roll-off Box Trucks            |                   | 4                 | 15                     | 54750          | 150         |
| Total                          |                   |                   | 100                    | 365000         | 1000        |

|                                   | TPY    | Tons/Load | Loads/Yr | Loads/Day |
|-----------------------------------|--------|-----------|----------|-----------|
| Number of Annual Trips (incoming) |        |           |          |           |
| Self Haul Vehicles                | 109500 | 0.45      | 243333   | 667       |
| Collection Route Trucks           | 200750 | 8         | 25094    | 69        |
| Roll-off Box Trucks               | 54750  | 4         | 13688    | 38        |
| Total                             | 365000 |           | 282115   | 773       |

### Average Daily Number of Trips (incoming)

|                                |             |
|--------------------------------|-------------|
| Self Haul Vehicles             | 667         |
| Collection Route Trucks        | 69          |
| Roll-off Box Trucks            | 38          |
| <b>Total Daily Round Trips</b> | <b>773</b>  |
| <b>ADT</b>                     | <b>1546</b> |

### Waste Recycling Center Traffic Total (outgoing)

|                             | Load Size<br>Tons | Percentage<br>of total | Annual<br>Tons | Avg<br>TPD7 |
|-----------------------------|-------------------|------------------------|----------------|-------------|
| Transfer Vehicles           | 22                | 75                     | 273750         | 750         |
| Trucks carrying recyclables | 10                | 25                     | 91250          | 250         |
| Total                       |                   | 100                    | 365000         | 1000        |

|                                   | TPY    | Tons/Load | Loads/Yr | Loads/Day |
|-----------------------------------|--------|-----------|----------|-----------|
| Number of Annual Trips (outgoing) |        |           |          |           |
| Transfer Vehicles                 | 273750 | 22        | 12443    | 34        |
| Large Trucks                      | 91250  | 10        | 9125     | 25        |
| Total                             | 365000 |           | 21568    | 59        |

### Average Daily Number of Trips (outgoing)

|                                |            |
|--------------------------------|------------|
| Transfer Vehicles              | 34         |
| Large Trucks                   | 25         |
| <b>Total Daily Round Trips</b> | <b>59</b>  |
| <b>ADT</b>                     | <b>118</b> |

### Waste Recycling Center Traffic Summary

Total Average Daily Number of Trips (incoming)

773 trips

Total Average Daily Number of Trips (outgoing)

59

**Total Daily Round Trips**

832

**ADT**

**1664**

Assume Peak Traffic is =

150%

=

1248 Round Trips  
Per Day

Peak ADT

=

2496 Trips  
(one way)



## COMPOSTING TRAFFIC ESTIMATE

1/27/03

### Quantity of materials estimated to be received in 2004

|                   |                      |           |                  |
|-------------------|----------------------|-----------|------------------|
|                   | 164250 tons per year |           | 450 tons per day |
|                   | 3159 tons per week   |           |                  |
| Selfhaul Vehicles | 5 percent            | 8213 TPY  | 23 tons per day  |
| Large Trucks      | 35 percent           | 57488 TPY | 158 tons per day |
| Transfer Vehicle  | 60 percent           | 98550 TPY | 270 tons per day |

#### Density of materials in vehicle loads

|                    |              |              |
|--------------------|--------------|--------------|
| Selfhaul Vehicles  | 100 lbs/CY = | 0.05 tons/CY |
| Lg Tks & Trans Veh | 600 lbs/CY = | 0.3 tons/CY  |

#### Average amount per load

|                   |              |               |
|-------------------|--------------|---------------|
| Selfhaul Vehicles | 2 CY/load =  | 0.1 tons/load |
| Large Trucks      | 25 CY/load = | 8 tons/load   |
| Transfer Vehicle  | 80 CY/load = | 24 tons/load  |

### Average loads of incoming materials per week

|                   |                          |                   |
|-------------------|--------------------------|-------------------|
| Selfhaul Vehicles | 1579 loads per week      | 226 loads per day |
| Large Trucks      | 147 loads per week       | 21 loads per day  |
| Transfer Vehicle  | <u>79</u> loads per week | 11 loads per day  |

Total loads per week 1806 loads per week

**Total loads per day 258 loads per day** 258 check

Total annual loads 93896 loads per year

**ADT 516 vehicle trips**

### Product Removal from Site estimated to be received in 2004

Product tonnage = 50 percent of incoming materials

82125 tons per year

1579 tons per week

|                   |            |
|-------------------|------------|
| Selfhaul Vehicles | 5 percent  |
| Large Trucks      | 35         |
| Transfer Vehicle  | 60 percent |

#### Density of materials in vehicle loads

|                    |              |             |
|--------------------|--------------|-------------|
| Selfhaul Vehicles  | 800 lbs/CY = | 0.4 tons/CY |
| Lg Tks & Trans Veh | 800 lbs/CY = | 0.4 tons/CY |

#### Average amount per load

|                   |              |               |
|-------------------|--------------|---------------|
| Selfhaul Vehicles | 3 CY/load =  | 1.2 tons/load |
| Large Trucks      | 20 CY/load = | 8 tons/load   |
| Transfer Vehicle  | 60 CY/load = | 24 tons/load  |

**Average loads of product removed per week**

|                   |                          |                  |
|-------------------|--------------------------|------------------|
| Selfhaul Vehicles | 66 loads per week        | 9 loads per day  |
| Large Trucks      | 69 loads per week        | 10 loads per day |
| Transfer Vehicle  | <u>39</u> loads per week | 6 loads per day  |

Total loads per week 174 loads per week

**Total loads per day 25 loads per day** 25 check

Total annual loads 9068 loads per year

**ADT 50 vehicle trips**

**Summary of Total Composting Traffic**

|                                          | Loads     | ADC       |
|------------------------------------------|-----------|-----------|
| Inbound Materials Traffic Total =        | 258       | 516       |
| Outbound Compost Product Traffic Total = | <u>25</u> | <u>50</u> |

**Total Composting Traffic 283 566**

File: w BMPC traffic

## COMPILATION OF OTHER MATERIALS AT WCL BMPC

### WOOD WASTES

1/27/03

#### Cubic Yards in Storage Piles Estimate

|        |          |          |          |
|--------|----------|----------|----------|
| Assume | Pile #1  | contains | 10000 CY |
|        | Pile #2  | contains | 45000 CY |
|        | Raw Pile | contains | 10000 CY |

|               |          |          |
|---------------|----------|----------|
| Raw Wood Pile | contains | 10000 CY |
| Product Piles | contain  | 55000 CY |

Conversion to tons at rate for wood

|              |    |              |
|--------------|----|--------------|
| Raw Material |    | 500 lbs/CY   |
|              | or | 0.25 Tons/CY |
| Products     |    | 800 lbs/CY   |
|              | or | 0.4 Tons/CY  |

#### Stored Materials Tonnage Estimate

|            |                |            |
|------------|----------------|------------|
| Raw Wood   |                |            |
| 10000 CY x | 0.25 Tons/CY = | 2500 Tons  |
| Products   |                |            |
| 55000 CY x | 0.4 Tons/CY =  | 22000 Tons |

Product storage = 22000 tons in place at one time & business  
sales allow processing and removal in 2 months or product  
storage is cycled 6 times per year

|                   |            |                  |
|-------------------|------------|------------------|
| Annual products = | 6 cycles x | 22000 tons/cycle |
|                   | =          | 132000 tons/yr   |
|                   | or         | 330000 CY/yr     |

#### Wood Traffic Total (incoming)

|                         | Density<br>lbs/CY | Load Size<br>CY | Percentage<br>of total | Annual<br>Tons | Annual<br>CY |
|-------------------------|-------------------|-----------------|------------------------|----------------|--------------|
| Self Haul Vehicles      | 100               | 3               | 2                      | 2640           | 52800        |
| Collection Route Trucks | 400               | 25              | 40                     | 52800          | 264000       |
| Trailer Trucks          | 400               | 100             | 58                     | 76560          | 382800       |
| total                   |                   |                 | 100                    | 132000         | 699600       |

| Number of Annual Trips (incoming) | CY/Yr  | CY/Load | Loads | Tons/Load |
|-----------------------------------|--------|---------|-------|-----------|
| Self Haul Vehicles                | 52800  |         | 3     | 17600     |
| Collection Route Trucks           | 264000 |         | 25    | 10560     |
| Trailer Trucks                    | 382800 |         | 100   | 3828      |
| Total                             | 699600 |         |       | 31988     |

| Average Daily Number of Trips (incoming) |     |
|------------------------------------------|-----|
| Self Haul Vehicles                       | 48  |
| Collection Route Trucks                  | 29  |
| Trailer Trucks                           | 10  |
| Total Trips                              | 88  |
| ADT                                      | 175 |

### Wood Traffic Total (outgoing)

|                    | Density<br>lbs/CY | Load Size<br>CY | Percentage<br>of total | Annual<br>Tons | Annual<br>CY |
|--------------------|-------------------|-----------------|------------------------|----------------|--------------|
| Self Haul Vehicles | 800               | 3               | 3                      | 3960           | 9900         |
| Large Trucks       | 800               | 25              | 28                     | 36960          | 92400        |
| Trailer Trucks     | 800               | 50              | 69                     | 91080          | 227700       |
| Total              |                   |                 | 100                    | 132000         | 330000       |

| Number of Annual Trips (outgoing) | CY/Yr  | CY/Load | Loads | Tons/Load |
|-----------------------------------|--------|---------|-------|-----------|
| Self Haul Vehicles                | 9900   |         | 3     | 3300      |
| Large Trucks                      | 92400  |         | 25    | 3696      |
| Trailer Trucks                    | 227700 |         | 50    | 4554      |
| Total                             | 330000 |         |       | 11550     |

| Average Daily Number of Trips (outgoing) |    |
|------------------------------------------|----|
| Self Haul Vehicles                       | 9  |
| Large Trucks                             | 10 |
| Trailer Trucks                           | 12 |
| Total Trips                              | 32 |
| ADT                                      | 63 |

### Wood Traffic Summary

|                                                |                          |
|------------------------------------------------|--------------------------|
| Total Average Daily Number of Trips (incoming) | 88                       |
| Total Average Daily Number of Trips (outgoing) | 32                       |
| <b>Total Daily Round Trips</b>                 | <b>119</b>               |
| <b>ADT</b>                                     | <b>239</b>               |
| Assume Peak Traffic is =                       | 150%                     |
|                                                | = 179 Round Trip Per Day |
| Peak ADT                                       | = 358 Trips (one way)    |

## COMPILATION OF OTHER MATERIALS AT WCL BMPC

### CONCRETE & ASPHALT MATERIALS

1/27/03

#### Cubic Yards in Storage Piles Estimate

|        |                  |         |           |
|--------|------------------|---------|-----------|
| Assume | Raw Rubble Piles | contain | 110000 CY |
|        | Products Piles   | contain | 60000 CY  |

Conversion to tons at rate for concrete, asphalt & products weigh

|              |    |             |
|--------------|----|-------------|
| Raw Material |    | 3200 lbs/CY |
|              | or | 1.6 Tons/CY |
| Products     |    | 3200 lbs/CY |
|              | or | 1.6 Tons/CY |

#### Stored Materials Tonnage Estimate

|             |               |             |  |
|-------------|---------------|-------------|--|
| Raw Rubble  |               |             |  |
| 110000 CY x | 1.6 Tons/CY = | 176000 Tons |  |
| Products    |               |             |  |
| 60000 CY x  | 1.6 Tons/CY = | 96000 Tons  |  |

Product storage = 176000 tons in place at one time & business  
sales allow processing and removal in 4 months or product  
storage is cycled 3 times per year

|                   |            |                   |      |
|-------------------|------------|-------------------|------|
| Annual products = | 3 cycles x | 176000 tons/cycle |      |
|                   | =          | 528000 tons/yr    | 1447 |
|                   | or         | 330000 CY/yr      | TPD  |

#### Concrete Traffic Total (incoming)

|                    | Density<br>lbs/CY | Load Size<br>CY | Percentage<br>of total | Annual<br>Tons | Annual<br>CY |
|--------------------|-------------------|-----------------|------------------------|----------------|--------------|
| Self Haul Vehicles | 3200              | 1               | 1                      | 5280           | 3300         |
| Large Trucks       | 3200              | 6               | 34                     | 179520         | 112200       |
| Trailer Trucks     | 3200              | 12              | 65                     | 343200         | 214500       |
| total              |                   |                 | 100                    | 528000         | 330000       |

| Number of Annual Trips (incoming) | CY/Yr  | CY/Load | Loads | Tons/Load |
|-----------------------------------|--------|---------|-------|-----------|
| Self Haul Vehicles                | 3300   | 1       | 3300  | 1.6       |
| Large Trucks                      | 112200 | 6       | 18700 | 9.6       |
| Trailer Trucks                    | 214500 | 12      | 17875 | 19.2      |
| Total                             | 330000 |         | 39875 |           |

Average Daily Number of Trips (incoming)

|                    |     |
|--------------------|-----|
| Self Haul Vehicles | 9   |
| Large Trucks       | 51  |
| Trailer Trucks     | 49  |
| TotalTrips         | 109 |

ADT

218

**Concrete Traffic Total (outgoing)**

|                    | Density<br>lbs/CY | Load Size<br>CY | Percentage<br>of total | Annual<br>Tons | Annual<br>CY |
|--------------------|-------------------|-----------------|------------------------|----------------|--------------|
| Self Haul Vehicles | 3200              | 1               | 1                      | 5280           | 3300         |
| Large Trucks       | 3200              | 6               | 20                     | 105600         | 66000        |
| Trailer Trucks     | 3200              | 12              | 79                     | 417120         | 260700       |
| Total              |                   |                 | 100                    | 528000         | 330000       |

|                                   | CY/Yr  | CY/Load | Loads | Tons/Load |
|-----------------------------------|--------|---------|-------|-----------|
| Number of Annual Trips (outgoing) |        |         |       |           |
| Self Haul Vehicles                | 3300   | 1       | 3300  | 1.6       |
| Large Trucks                      | 66000  | 6       | 11000 | 9.6       |
| Trailer Trucks                    | 260700 | 12      | 21725 | 19.2      |
| Total                             | 330000 |         | 36025 |           |

**Average Daily Number of Trips (outgoing)**

|                    |     |
|--------------------|-----|
| Self Haul Vehicles | 9   |
| Large Trucks       | 30  |
| Trailer Trucks     | 60  |
| Total Trips        | 99  |
| ADT                | 197 |

**Concrete Traffic Summary**

|                                                |                          |
|------------------------------------------------|--------------------------|
| Total Average Daily Number of Trips (incoming) | 109                      |
| Total Average Daily Number of Trips (outgoing) | 99                       |
| <b>Total Daily Round Trips</b>                 | <b>208</b>               |
| <b>ADT</b>                                     | <b>416</b>               |
| Assume Peak Traffic is =                       | 150%                     |
|                                                | = 312 Round Trip Per Day |
| Peak ADT                                       | = 624 Trips (one way)    |



|            |    |
|------------|----|
| TotalTrips | 47 |
| ADT        | 93 |

### Soil Traffic Total (outgoing)

|                    | Density<br>lbs/CY | Load Size<br>CY | Percentage<br>of total | Annual<br>Tons | Annual<br>CY |
|--------------------|-------------------|-----------------|------------------------|----------------|--------------|
| Self Haul Vehicles | 3000              | 1               | 1                      | 1950           | 1300         |
| Large Trucks       | 3000              | 6               | 20                     | 39000          | 26000        |
| Trailer Trucks     | 3000              | 12              | 79                     | 154050         | 102700       |
| Total              |                   |                 | 100                    | 195000         | 130000       |

| Number of Annual Trips (outgoing) | CY/Yr  | CY/Load | Loads    | Tons/Load |
|-----------------------------------|--------|---------|----------|-----------|
| Self Haul Vehicles                | 1300   | 1       | 1300     | 1.5       |
| Large Trucks                      | 26000  | 6       | 4333.333 | 9         |
| Trailer Trucks                    | 102700 | 12      | 8558.333 | 18        |
| Total                             | 130000 |         | 14192    |           |

### Average Daily Number of Trips (outgoing)

|                    |    |
|--------------------|----|
| Self Haul Vehicles | 4  |
| Large Trucks       | 12 |
| Trailer Trucks     | 23 |
| Total Trips        | 39 |
| ADT                | 78 |

### Soil Traffic Summary

|                                                |                          |
|------------------------------------------------|--------------------------|
| Total Average Daily Number of Trips (incoming) | 47                       |
| Total Average Daily Number of Trips (outgoing) | 39                       |
| <b>Total Daily Round Trips</b>                 | <b>85</b>                |
| <b>ADT</b>                                     | <b>171</b>               |
| Assume Peak Traffic is =                       | 150%                     |
|                                                | = 128 Round Trip Per Day |
| Peak ADT                                       | = 256 Trips (one way)    |



## COMPILATION OF OTHER MATERIALS AT WCL BMPC

### WET WASTES/POWDERY WASTES PROCESSING

1/27/03

#### Cubic Yards of Processing Capacity Estimate

|        |                    |                         |
|--------|--------------------|-------------------------|
| Assume | Raw Liquid Wastes  | 11500 gallons per batch |
|        | Raw Wet Wastes     | 120 CY per batch        |
|        | Raw Powdery Wastes | 220 CY per batch        |
|        | Products           | 400 CY per batch        |

#### Density:

|                    |               |                |
|--------------------|---------------|----------------|
| Raw Wet Wastes     | 2500 lbs/CY = | 150 tons/batch |
| Raw Powdery Wastes | 1800 lbs/CY = | 198 tons/batch |
| Products           | 2800 lbs/CY = | 560 tons/batch |

#### Estimate of Annual Materials Estimate

Each batch processed in                      2 days =                      2.5 batches/Week

Annual Production                      130 Batches per year

#### Processing capacity =

|                                             |                  |
|---------------------------------------------|------------------|
| amount of liquids processed annually        | 1495000 gal/year |
| amount of wet wastes processed annually     | 19500 tons/year  |
| amount of powdery wastes processed annually | 25740 tons/year  |

Annual products =                      72800 tons/year

#### Wet/Powdery Wastes Traffic Total (incoming)

|                                          | Batch<br>Amount | Load Size | Trips/<br>Batch |
|------------------------------------------|-----------------|-----------|-----------------|
| Tank Trucks                      gallons | 11500           | 2000 gal  | 6               |
| Wet Wastes Large Trucks    tons          | 150             | 8 tons    | 19              |
| Powdery Wastes Trucks    tons            | 198             | 6 tons    | 33              |
| total                                    |                 |           | 58              |

#### Number of Annual Trips (incoming)

|                       |                |
|-----------------------|----------------|
| Tank Trucks           | 748 trips      |
| Wet Wastes Vehicles   | 2438           |
| Powdery Wastes Trucks | 4290           |
| Total                 | 7475 (rounded) |

#### Average Daily Number of Trips (incoming)

|                     |   |
|---------------------|---|
| Tank Trucks         | 2 |
| Wet Wastes Vehicles | 7 |

Powdery Wastes Trucks 12

|             |              |
|-------------|--------------|
| Total Trips | 20 (rounded) |
| ADT         | 41           |

### Wet/Powdery Wastes Traffic Total (outgoing)

|                | Batch<br>Amount | Load Size<br>tons | Percentage<br>of total | Trips/<br>Batch |
|----------------|-----------------|-------------------|------------------------|-----------------|
| Trailer Trucks | 560             | 12                | 100                    | 47              |
| Total          |                 |                   | 100                    | 47              |

Number of Annual Trips (outgoing)

|                |      |
|----------------|------|
| Trailer Trucks | 6067 |
| Total          | 6067 |

Average Daily Number of Trips (outgoing)

|                |              |
|----------------|--------------|
| Trailer Trucks | 17           |
| Total Trips    | 17 (rounded) |
| ADT            | 33           |

### Wet/Powdery Wastes Traffic Summary

|                                                |                              |
|------------------------------------------------|------------------------------|
| Total Average Daily Number of Trips (incoming) | 20                           |
| Total Average Daily Number of Trips (outgoing) | 17                           |
| <b>Total Daily Round Trips</b>                 | <b>37</b>                    |
| <b>ADT</b>                                     | <b>74</b>                    |
| Assume Peak Traffic is =                       | 150% = 56 Round Trip Per Day |
| Peak ADT                                       | = 111 Trips (one way)        |

**APPENDIX D**

**DRAFT EIR APPENDIX 3H**

**BIOSOLIDS MANAGEMENT PLAN SUMMARY  
(REVISED)**

**APPENDIX 3H**  
**BIOSOLIDS MANAGEMENT PLAN SUMMARY**  
**FOR THE**  
**WEST CONTRA COSTA**  
**BULK MATERIALS PROCESSING CENTER**

~~December 2002~~February 2004

**PREFACE**

The West County Landfill (WCL) is continuing its program of working with the adjacent West County Wastewater District (WCWD) in management of the biosolids generated from the District's Public Operated Treatment Works (~~POTW~~WWTF). This document summarizes the activities planned at the Landfill to receive, process and recover the biosolids. Materials from other ~~POTW~~WWTFs may be received if within the ability of the WCL to handle the materials. This program is part of the WCL Bulk Materials Processing Center (BMPC).

The biosolids management program also is proposed to include processing a portion of the biosolids materials in the WCL Composting Program. A full composting permit is being requested for the upsized composting operation to expand the scope from the existing Green Material Composting Permit held by the WCL.

This summary includes the following aspects of the biosolids management program:

1. Background Information
2. Biosolids Handling Concepts
3. Biosolids Description
4. Possible Co-processing With Other Materials
5. Location of Handling Facilities
6. Specifications for Biosolids Spreading and Drying
7. Runoff Control
8. Processed Biosolids Removal
9. Protection of Landfill Cap and Annual Maintenance Activities
10. Other Environmental and Operational Factors
11. Monitoring and Reporting
12. Facility Cleanup and Closure Activities

## **1. BACKGROUND INFORMATION**

Contractual arrangements have been made between the WCL and the WCWD for the landfill company to provide for annual cleanout and disposal of the ~~POTW~~WWTF biosolids. The long-term permit agreement was established in 1999. The two entities have been cooperatively investigating the possible ways that areas of the WCCSL could be used for biosolids drying and the manner of using the processed materials.

The goal of these studies is determining how an alternative manner of biosolids handling can be conceived and permitted, thus allowing for replacement or reduction of use of the existing WCWD biosolids lagoons. During 2000 and 2001 the lagoon-dried biosolids were successfully used as soil amendment materials on the final caps constructed on the MSW landfill. Currently the biosolids removed from the drying lagoons contain greater than 50% solids and require no further drying before use at the WCCSL.

This summary primarily covers the proposed spreading of the biosolids on specific site areas as soil conditioner and the processing and recovery of the materials. One program involves the annual spreading of biosolids on final capped areas of the landfill as an annual activity to improve the erosion control vegetation growing conditions. This may include both the MSW landfill and the closed Hazardous Waste Management Facility. The second program envisions use of the southern and eastern MSW landfill slopes as locations for annual repetitive spreading and drying of high moisture content biosolids.

As mentioned in the Preface, the biosolids management program also is proposed to be affiliated with biosolids composting at the WCL.

## **2. BIOSOLIDS HANDLING CONCEPTS**

The following information is directed to spreading and drying the biosolids on the MSW landfill slopes. This presents the outline of the concepts for segregation, storage, spreading and processing of the materials. This operation may also be applicable to using portions of the Hazardous Waste Management Facility if as allowed by the approved Postclosure Plan and the DTSC Permit.

## Delivery of Biosolids

*Delivery by truck* – The moisture content of the biosolids that can be trucked to the WCL can cover an extensive range. Biosolids of high moisture content (e.g. 25 to 10% solids) can be hauled in a tank truck. Lower moisture content materials (20% solids or greater) can be hauled by a dump truck.

Spreading of the biosolids carried by truck to the WCL involves unloading the materials at both the top of slope and at the base.

This requires the trucks to have unencumbered access to these spreading areas. The access roads available to be used by the trucks and the biosolids application areas are shown on Figure 3H-1.

Only the lower moisture content materials area are applicable to unloading the biosolids at the bottom of the slope to be spread up the slopes with a dozer.

*Delivery by pipeline* – The transportation of biosolids through the pipeline for the 4000 foot distance between the POTWWTF and the WCL spreading area requires the material to be less than of about 6% solids.

WCL envisions the transport pipeline to be buried in an alignment that extends from the northwest gate of the POTWWTF and runs parallel to the leachate pipelines passing by the power plant and the HWMF leachate treatment facility. This pipeline is shown in approximate location on Figure M1. Aboveground pipes would run along the top of the east and south landfill slopes.

## Storage

At the WCCSL large volume storage of the high moisture content biosolids pumped from the POTWWTF probably is limited to ponds that would be created in Area A. This option would allow less lagoon area to be needed at the POTWWTF. However, Area A may be used as the location of the Waste Recycling Center, and hence may not be available. Wastes underlie all other areas at the WCCSL, and thus ponds cannot be used there. A 20,000-gallon tank may be established on the landfill central plateau to serve as a filling station for the spray truck.

Storage of lower moisture content materials trucked to the WCCSL would be in the form of unloading the biosolids in piles and rows at the top or base of the slope where they are to be spread. These truckload piles may sit in these locations for up to one week while awaiting the scheduled spreading of the material on the slope. Monitoring of the piles will be done by observing the pile area to detect any nuisance odors. Through experience in handling the stored biosolids, a management schedule

will be created to avoid odors, yet allow some moisture to be removed during the storage time, while sequencing the spreading operation to result in site equipment usage to be optimized.

During the wet weather season when spreading at the WCCSL is not possible, the biosolids produced by the WCWD and Richmond WWTFs would require storage in the existing lagoons. If storage of the biosolids in the lagoons at the WCWD would require new measures of lagoon management, then the feasibility of such storage will need to be determined through the demonstrations and evaluations identified in the project EIR mitigation measure 10-7.

### Spreading

Spreading of the lower moisture content biosolids carried by truck to the top of slope and at the base would be conducted using a dozer tractor. The tractor would move the materials from the storage piles and push them downhill or uphill.

The intent is to spread the materials in the area designated for that amount of biosolids to a depth of about 3 to 4 inches. After that layer has dried, in one or two weeks an additional layer can be applied.

Spreading of the pipeline-discharged high moisture biosolids may occur by gravity flow for the 100 to 200 foot distance down the slope. Further spreading of the accumulated application to achieve a uniform thickness layer would be accomplished using the dozer. Alternately, the liquid biosolids may be sprayed from a tank truck or through large diameter nozzle sprinklers. The truck would be driven above the bench roads and the biosolids would be sprayed downwind.

### Drying

Solar drying will be the major mechanism to reduce the moisture contained in the biosolids lying on the slopes. Moisture removal also will be accomplished from wind blowing across the slopes. The drying will occur over a week or two during the sunny days of late spring, summer and fall. During lower temperature periods, the biosolids may skin over, trapping the moisture in the bottom of the layer. At those times, the dozer may be used to track through the materials and break the skin crust.

Another potential drying method is growing plants such as rye grass or wheat to consume the moisture of the biosolids spread during the wet weather season. This may be very applicable to the pipeline or truck spraying options since the spreading of the biosolids flowing down the slopes would resemble flood-type irrigation of crops and the spraying would sprinkle the liquid biosolids over the plants. At the appropriate time, the plant materials may be harvested from the slopes and processed in the composting facility, or be cut and baled for erosion control on construction areas.

### Removal or Incorporation into Landfill Cap

If the dewatered biosolids materials are not to remain in place they will be removed by a dozer tractor, pushing the dried material to the base of the slope to the loadout areas.

Incorporation of dried biosolids in the final landfill cap involves determining that the new depth of biosolids is desirable. This may be through co-spreading of the biosolids with solidified wastes and soils. This mixture will add to the thickness of the final cap, providing additional protection of the landfill.

## **3. BIOSOLIDS DESCRIPTION**

### Sources

The adjacent West County Wastewater District and the Richmond WWTFs would be the major sources of biosolids processed at the WCL. Another possible source is the other WWTF in the West County area at Pinole. ~~Other possible sources are the other POTW WWTFs in the West County area in Hercules and Pinole.~~ Additional POTW WWTFs in the region may be served if sufficient biosolids handling capacity exists at the WCL.

### Characteristics

The candidate biosolids are restricted to adequately digested biosolids that represent no health risks. The moisture content range will range from about 2 percent to 75 percent solids. In this discussion “high moisture content biosolids” are defined as having a moisture content of between 2 to 6 percent by weight.

### Quantity

The quantity of biosolids generated per month at the WCWD averages about 2 million gallons at 2 to 5 % moisture. This is equivalent to 10,000 cubic yards per month at 5% solids or 8,500 tons per month. This amount does not include approximately the same magnitude of biosolids produced by the City of Richmond WWTF, which is also removed from the drying lagoons and managed at the WCCSL.



The biosolid quantities available from other sources are yet to be determined, but are expected to be only about 50% of the biosolid amounts generated by the WCWD and the City of Richmond.

#### Chemical Character

The biosolids are analyzed annually to provide a listing of the inorganic and organic chemical substances contained in the materials. No constituents of concern are anticipated from the expected ~~POTW~~WWTF sources of the biosolids. A listing of the results of laboratory analysis of the WCWD biosolids is included at the end of this Appendix.

### **4. POSSIBLE CO-PROCESSING WITH OTHER MATERIALS**

A parallel program to the biosolids processing is the spreading of dredged materials generated by local bay and harbor dredging operations. Another group of materials that may be spread on the slopes is the solidified materials developed from the processing of the wet wastes/powdery materials. Prior to the acceptance of any material, the generator's technical representatives must supply data to WCL, Inc. that shows the material meets the WCCSL acceptance criteria.

#### Dredged Materials

The dredged materials are the silty and sandy deposits removed from bay channels and harbors during dredging projects. These types and sources of materials have been identified in the BCDC dredged materials management alternatives evaluation. These are wet materials that require substantial drying and should only be spread to a depth of about one foot until dry.

#### Solidification Materials

WCL, Inc. proposes to operate a solidification program. Typical candidate materials are wet wastes and powdery materials that include silt biosolids from sumps and baghouse fines. The solidification is achieved by blending wet and dry materials or adding wet or dry soil to result in the desired moisture content and material plasticity.

## Soil

Excess soils may be spread on the slopes to allow combining with biosolids or solidification materials, or to thicken the final cap. These soils would be those free of tree branches, rocks, concrete and rubbish.

## Miscellaneous

*Foundry Sand* – The WCCSL receives foundry sand from the companies operating in Berkeley. After closure of the active landfill, an alternative handling method must be found. These dust prone materials can not be handled through a transfer station.

*Sand Blast* – Spent sand blast requires disposal and would make a good addition to the biosolids cake if the metals content is acceptable.

# **5. LOCATION OF HANDLING FACILITIES**

## Management Areas

The prime locations for the repetitive biosolids spreading areas are the south and east slopes of the MSW landfill. These locations are shown on Figure 3H-1.

The access routes to the east and south slopes are shown on Figures 3H-1. These include the main haul road climbing up to the top of the central plateau of the MSW landfill, and the south slope roads. The main access roads to the siting area are graveled and provide all-weather access. Maintenance grading is provided to assure that the appropriate road smoothness, surface drainage and dust control is maintained. These roads are also used for access to the other site areas. Site maintenance inspection and roads spur off of these roads allowing equipment to reach all parts of the slopes.

The area available on the south slope is ~~14~~ approximately 20 acres. ~~The eastern slope area is about 5 acres.~~

~~The liquid biosolids could be sprayed on other slope areas. Subsequently, these areas would be disked to incorporate the biosolids into the cover soil, or left as a thin layer on the vegetation.~~

## Description of Side Slope Areas

The upper and lower south ~~and east~~-slope areas average a 3:1 horizontal to vertical slope angle. The length of the slopes range from 50 to 400 feet.

The slopes are covered with low vegetation in the form of weedy plants and grasses. Prior to application of the biosolids, the vegetation would be mowed or trampled with a dozer tractor to reduce the height of the vegetation to a few inches, if necessary.

#### Adjacent Uses At Landfill

Existing uses are the organics receiving and grinding area and the waste shuttle area. When the landfill closes, ~~one of the alternative areas for locating the Waste Recycling Center is~~ the waste solidification facility is planned to be located on top of the landfill central plateau, immediately above the south landfill slope.

~~Another potential~~The Alternate siting area of the Waste Recycling Center is Area A, which is at the base of the eastern slope and just east of the end of the southern slope.

The joint operation of the biosolids spreading area and the waste solidification facility and Waste Recycling Center at ~~either of these areas~~ should occur without any problems.

## **6. SPECIFICATIONS FOR BIOSOLIDS SPREADING & DRYING**

The objective of the biosolids spreading is to apply the materials in a uniform manner over the area. The thickness of the new layer is selected to allow the biosolids to quickly dry in the sunlight and from the wind so that another layer can be spread on the biosolids processing slopes or to allow tilling or blending of the dried materials into the landfill final cap. If they are sprayed on the cover plants prior to the ~~day~~dry-weather season, the plants would in essence be irrigated with the liquid. Thus, the plants may stay green all summer, resulting in more moisture removal through evapotranspiration.

The moisture content of the biosolids governs the spreading method. Biosolids with high water content will flow down the slope. Those of lower moisture content will need to be spread down or up the slope with a low-ground pressure dozer tractor.

#### Spreading by Truckload

The concept is to deliver the low moisture content biosolids to the slopes adjacent to the access roads. Usually the intent is to spread the materials down the slope. Very high moisture content biosolids (2 to 6% solids) would be hauled by a tank truck and the materials would be sprayed through a nozzle directly onto the slopes. Also they could be spread from a hose and allowed to flow down the slope. Possibly they could be discharged directly from the truck and be allowed to flow down the slope. Biosolids with lower moisture content would be carried to the spreading area in a dump truck. The truck would dump the load at the top of the slope, and sometimes at the base of the slope. The dozer tractor would uniformly spread the biosolids down or up the slope.

### Spreading via a Piping System

Due to the large number of tank truck loads that would be required to ~~handling-handle~~ the annual generation of the POTW~~WWTF~~ biosolids, it may be desirable to pump the high moisture content biosolids directly from the POTW~~WWTF~~ through a buried pipeline that links the treatment plant with the top of the landfill. Pipelines ~~are being-were~~ constructed during 2002-2003 for leachate handling and non-potable water delivery to the landfill. A pipeline and the pumping system with lateral pipelines running along the top of the south and east slopes could be included ~~in the~~ as a future project.

The manner of discharging the biosolids may be via a hose to spray the materials onto the slope. An alternative manner of biosolids discharge may be through a piping system which large-sized holes drilled every foot or so that will allow the sludge to be discharged along the slope top.

The pipeline could also be connected to the storage tank located on top at the central plateau.

### Specifications for Reuse as Dried Biosolids

The amount of moisture in the processed biosolids will be related to the intended use of the biosolids.

Dried biosolids to be used for soil conditioner usually will contain from 20 to 40 percent moisture. The higher the moisture content, the heavier the ~~load which~~ load, which affects the transportation of the product.

No chemical constituents are anticipated to be present in the dried biosolids that would restrict the use of the materials as soil conditioners.

### Specifications for Reuse of Biosolids Mixed with Soil

The finished dried biosolids mixed with soil will contain from 20 to 40 percent moisture.

The chemical nature of the biosolids/soil mix is expected to be neutral. Both the biosolids and the soils placed on the processing area will be checked to assure that no excessive contaminant levels will occur.

To prepare the biosolids and soil for mixing, the soil and biosolids will be spread in layers. This will involve several alternating layers of biosolids and soil. When the layers are excavated during the removal of the materials from the slopes, mixing will occur. As the hauling trucks are loaded, additional mixing will occur.

#### Specifications for Incorporating into Side Slope Final Cover

The dried biosolids to be incorporated into the slope final cover will contain from 20 to 60 percent moisture. The mixing method will determine the amount of acceptable moisture content. If the materials are to be plowed into the upper layer of the landfill cap, the moisture content could extend across the entire range. To mix the materials by track-walking the slope with a dozer requires the materials to be drier, probably less than 40 percent moisture.

The anticipated areas where the dried biosolids would be incorporated into the final cover include the western end of the landfill, the northern side, the eastern side, and the southern side facing the north side of the HWMF.

To create better vegetation growing conditions, dried biosolids may also be mixed into the HWMF final cap vegetative soil layer. After spreading, the materials may be left in place of several weeks to achieve further drying before incorporating them into the vegetative soil layer.

If the drying lagoons are no longer used at the POTWWTF, then the dried materials to be spread on the final cap areas will be obtained from the ~~east or~~ south slope biosolids processing areas.

#### Specifications for Composting the Biosolids

One method of composting the biosolids is to directly apply the wet biosolids from a tank truck to the windrows. This would add both nutrients and moisture to the green materials being composted.

It may be desirable to first process the biosolids by storing them on the slope spreading areas. For example, the compost operation cannot receive much high moisture content biosolids during the wet weather season. Some biosolids may be spread down the south slopes during the dry weeks that periodically occur during the rainy season. Then in April-May these semi-dried biosolids could be removed and be placed in the compost windrows for processing into compost. If the biosolids have been dried on the slopes to remove sufficient moisture for composting, the moisture content may range from 30 to 60 percent.

### Rates of Repetitive Spreading on the Processing Areas:

Table 1 presents an initial estimate of the amounts of biosolids that can be placed on the available WCL slopes. The assumptions and general calculations are shown, giving the range of materials that can be accommodated on the slopes. Approximately ~~22~~20 acres appear to be available.

The rate of spreading is dependent upon the time required to dry the biosolids to the desired moisture content. A 3-inch thick layer of biosolids may dry within one week if the daily maximum temperature exceeds 70 degrees and some wind is present. Cooler temperature will require greater times. Spraying the biosolids from a tank truck will be limited by the tendency of the liquids to run down the slope. A vegetated surface will hold more liquids than a bare soil slope.

The estimated application amounts range from about 2,900 gallons per acre to 8,700 gallons per acre. Assuming that applications can be made four times per month, then from 260,000 gallons to 770,000 gallons can be applied per month. The applications can only be made during the 5 dry weather months between April and October.

*Truckloads* – The above monthly ranges equate to 4 to 12 truckloads per day.

*Pipeline or tank truck discharge* – The above monthly ranges equate to 8,700 to 26,000 gallons per day.

The above estimated rates will be re-evaluated after the test-spreading program. WCL, Inc. has conducted a limited test spreading of the biosolids to gather additional information that can be applied to the design of the pipeline spreading and truck spraying option. The tests conducted in 2002 confirmed the feasibility of applying the 2% to 6% solids content biosolids on the landfill slopes.

In the test applications conducted in 2002 the following were noted. Two test procedures were conducted during summer 2002. The first was the direct bulk placement of the liquid biosolids on the vegetated final capped landfill slope from the back gate of the tank truck. The second involved spraying the biosolids through a hose, pump and nozzle connected to the tank truck.

In the first test, approximately 2000 gallons were unloaded in about 5 minutes from the tank truck when parked at the top of the 3:1 H:V slope. The biosolids quickly fanned out downslope in approximately a 20-foot wide swath. But, much of the liquid ran in concentrated flow approximately 6 inches to 1-foot wide downslope through the 6 to 12 inch high dried browned-off vegetation. The liquid evaporated within several days and no penetration into the soil cover occurred. It was apparent that to obtain a more consistent application, the biosolids would need to be discharged through a diffuser pipe laid at the top of the slope, or they should be sprayed on the

hillside.

Page for Table 1

Table 1

## APPLICATION OF BIOSOLIDS TO SPREADING AREAS VOLUME OF LIQUIDS APPLIED

**Example 1**  
**SPREADING RATE = 1 GALLON/5 SQ FT**

| Zone  | Area<br>Acres | Area<br>Sq Ft | Rate<br>1/5 gal/sf | Quantity<br>Gallons |
|-------|---------------|---------------|--------------------|---------------------|
| 1     | 3.2           | 140000        | 5                  | 28000               |
| 2     | 9.9           | 430000        | 5                  | 86000               |
| 3     | 5.1           | 220000        | 5                  | 44000               |
| 4     | 4.4           | 190000        | 5                  | 38000               |
| Total | 22.5          | 980000        |                    | 196000              |

**Example 2**  
**SPREADING RATE = 1 GALLON/15 SQ FT**

| Zone  | Area<br>Acres | Area<br>Sq Ft | Rate<br>1/15 gal/sf | Quantity<br>Gallons |
|-------|---------------|---------------|---------------------|---------------------|
| 1     | 3.2           | 140000        | 15                  | 9333                |
| 2     | 9.9           | 430000        | 15                  | 28667               |
| 3     | 5.1           | 220000        | 15                  | 14667               |
| 4     | 4.4           | 190000        | 15                  | 12667               |
| Total | 22.5          | 980000        |                     | 65333               |

Notes:

Quantity in gallons represents the amount per application

Assumes uniform spreading of the biosolids over available area

Berm at base of each slope intercepts and routes runoff water



The second test involved spraying two 4000-gallon tank truckloads on the slope. Due to the equipment used and the approximately 15 mph wind conditions, the liquid biosolids were sprayed up the final capped slope. This allowed effective observation of the runoff pattern and the biosolids spraying could be applied to different portions of the area (bare soil versus 12 inch deep dried vegetation) in durations that were varied to avoid runoff. Approximately 4 times more liquid could be applied to the vegetated area compared to the bare soil. The vegetation absorbed or restricted the water from flowing downslope. The spray application, using a monitor nozzle with a 1-inch opening, resembled a hydroseeding application that uses a low mulch content mix. With the equipment used and the wind conditions, the biosolids spray range extended up slope about 80 to 100 feet. The final result was a covering over the soil and vegetation less than 1/16<sup>th</sup> inch thick. The application rates achieved in the test appear to have averaged about 0.5 gallons per sq ft on the bare soil, and 3 to 4 gallons per sq ft on the vegetated slope. The 4000-gallon load was sprayed over the hillside in about 10 minutes. The soil cover surface dried within several hours, with no penetration. It would appear that on a sunny, windy day that several spray applications could be made on the same day over an area.

Prior to full-scale implementation of the biosolids spreading, further testing will be conducted to refine the rates and methods of application.

## **7. RUNOFF CONTROL**

This discussion primarily applies to the biosolids processing areas located on the south and east final capped slopes of the landfill.

After the biosolids spreading has been approved by all agencies, the biosolids spreading area will be named in the WCCSL Stormwater Control Program filed with the State. Sampling points will be established as described below.

### **Drainage Control**

The drainage grading for the area above the processing area slopes will prevent the water from these upper areas from entering the slope area. The grades surrounding the processing area would be maintained such that drainage will flow around and away from the area.

### Controls At Base Of Slope

The control concept is to place a berm at the base of the slope where the runoff water would be collected in a series of low points where pumps would be located in sumps. At the base of the slopes the landfill leachate pipeline is buried within a berm that overlies the final cap. That berm would be raised in height to contain the runoff and direct the water to the pump sumps. Grasses would be planted to transpire water and uptake nutrients in the ditches behind the berm. The locations of the runoff control berms and channels are shown on Figure 3H-1.

### Runoff Handling – Pump to POTWWTF

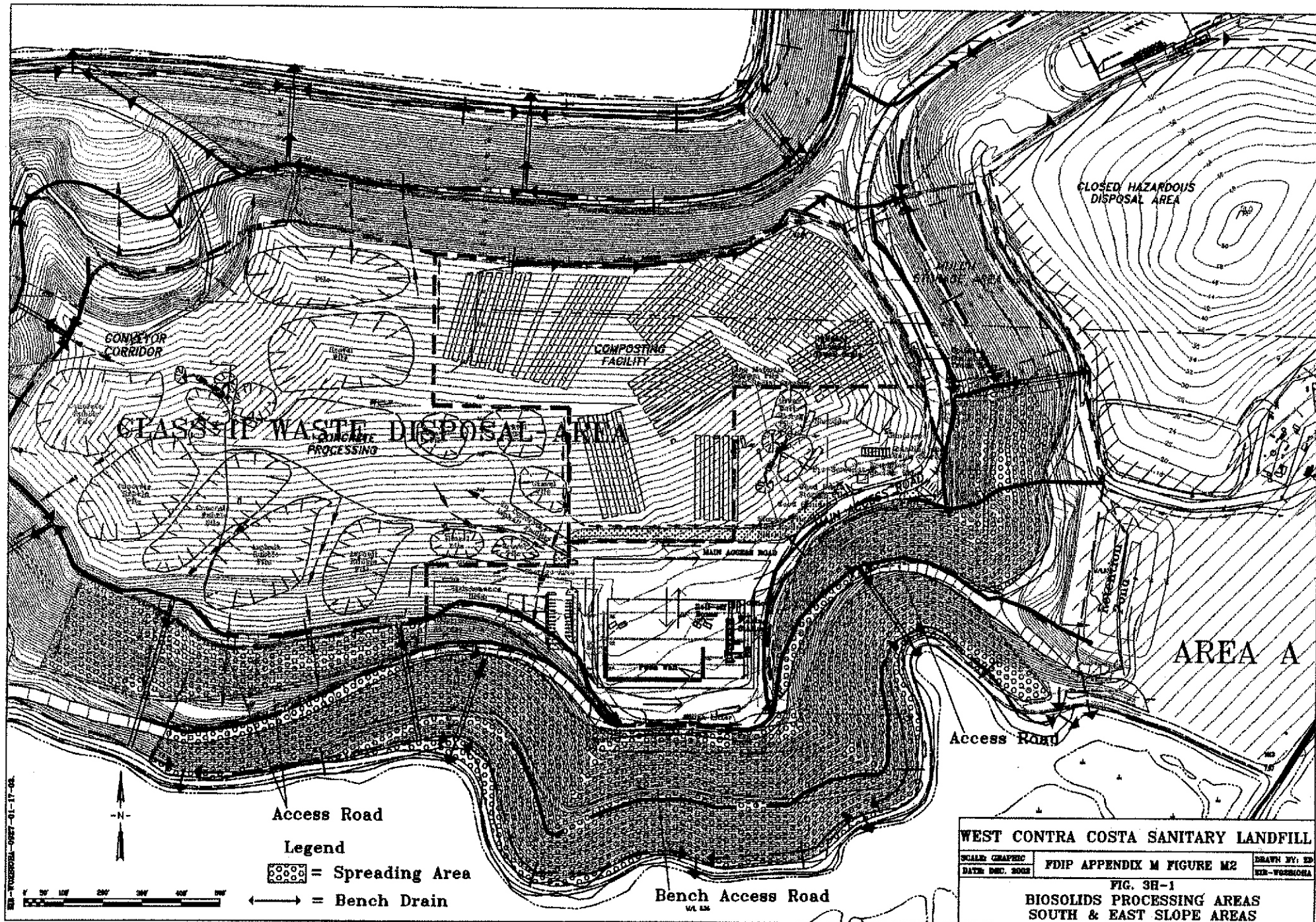
The water may be pumped into the leachate piping system used for the HWMF treated leachate discharge to the WCWD sewer. The amount of water from stormflow off 20 acres of WCCSL slope area would be similar to the water now pumped-removed off of the~~from an equivalent area of~~ existing biosolids drying lagoons at the WCWD POTWWTF. That rainwater now is decanted off of the ponds and ~~pumped back~~ sent by gravity flow to the POTWWTF headworks.

### Pump To Top Of Slope For Evaporation

An alternative manner of handling and disposing the rainwater is to evaporate it on the slope. This option is only available during the last portion of the wet weather season. However, during the wet season usually during December or January, several weeks of dry weather occur each year. The runoff can be pumped to the top of the slope where it will evaporate after it wets the slope. This procedure may require an additional depth of about 2 feet of soil on the slope to provide additional soil moisture storage capability during the wet weather season.

### Stormwater Monitoring Sampling Points

*Drainage from Areas Where Dried Biosolids are Spread as Soil Amendment on the Final Capped Areas –* The-These areas are the surface areas other than the repetitive application Southern Slope Spreading Area. In these northern, eastern and western slope areas the erosion control plants growing on the landfill cap uptake nutrients and consume large amounts of moisture. Some of the moisture infiltrates into the root zone during the wet season and is stored. Subsequently the plant transpiration process extracts this moisture until the plant withers during the dry season. The warm weather evaporation removes the remaining moisture.



Stormwater moisture in excess of the soil field capacity will run off. For those areas where the biosolids have been placed in that year as soil amendment, WCL will maintain an unscreened compost windrow or shredded green material (approximately 8 feet wide and 2 feet deep) at base of the spreading area for first season. At the WCL this method has been shown to retain a significant amount of runoff from the periodic rainstorms, and the nutrients are absorbed in the windrow. In the second season the base of slope windrowed materials will be spread on the slope as a thin mulch layer. Observations will be made for rainfall runoff from these areas and to check that the runoff handling system is functioning as anticipated.

The application of biosolids on the northern, eastern and western final capped slope areas will follow a rotational pattern. A specific annual area will be designated and used that year, and that area probably will not receive the next application for 5 to 10 years. Monitoring results from the areas used will provide information that will indicate the next scheduled application time.

*Drainage from Processing Areas* – The processing areas will essentially be in a disturbed condition during the entire year as the repetitive spreading and drying cycles occur. No plants will be present on the slopes initially in the wet weather season. Thus, the rainfall runoff could contain suspended and settleable solids, and dissolved nutrients. These rainfall runoff flows will require containment. At the processing areas, runoff drainage will be diverted at the base of slope. This design feature is described earlier in this section. The water will flow to pumps that will pump the runoff back to the top of the slope during times of no rainfall, or discharge the water into the leachate discharge line utilized to normally deliver batches of HWMF treated leachate effluent to the WCWD. Hence these rainwater flows would not be discharged into the Class II site leachate discharge pipeline and would not be diverted to the Richmond WWTF. No HWMF treated landfill leachate effluent will be pumped during the periods when the stormwater is being transported to the POTWWWTF. The runoff volume should be less than the amount of rainfall that would have been collected in the same area of the existing drying lagoons, in as some water will be evaporated and shallow infiltration and temporary storage of the rainfall would occur on the slope.

## **8. PROCESSED BIOSOLIDS REMOVAL**

This discussion applies to the biosolids processing areas located on the south and east final capped slopes of the landfill.

### **Method**

A dozer tractor will push the biosolids to the base of the slope for loadout. The tractor operator will carefully skim off the layer of material leaving a thin residue to avoid removal of the final cap vegetative soil layer. The dried materials will be accumulated at the base of the slope and temporarily stockpiled. These storage zones are adjacent to the access roads.

A rubber tired loader will load out the stored materials into dump trucks for transport to the market location, to the composting facility, or to another slope area on the landfill for final spreading as soil conditioner. After removal of the dried biosolids, the tractor will backblade the slope to smooth it for the next application of biosolids.

The removal activities will be practically restricted to the dry seasons of the year when truck access is available to the loading area.

### Equipment

The following equipment would be used:

- Tank truck to transport high moisture content biosolids to the composting facility or to the spreading slopes.
- Dozer tractor that would be used to spread the materials evenly on the slopes, and push the dried materials to the loadout area.
- Rubber tired loader used to load out the dried biosolids.
- Hauling trucks to transport the biosolids to the composting area or site slope areas, or to off-site use points.
- Water trucks for access road dust control.
- Pumps to handle slope stormwater runoff.

### Schedule

The schedule will be set by the rate of drying that occurs on the slopes. It is preferable to spread multiple layers of materials on the slopes. The addition of soils and other solidified wastes will depend on the availability of those materials. The removal schedule will be determined when the biosolids moisture content has reached the desired levels for subsequent marketing of the material or for composting. Also, the scheduling of the dried biosolids removal may be related to preparing the slope for the upcoming wet weather season.

## **9. PROTECTION OF LANDFILL CAP & ANNUAL MAINTENANCE**

### **ACTIVITIES**

#### Description of Caps

The Class II site final cap is composed of compacted soil. The soil profile is composed of 2 feet of foundation soil, 1 foot of compacted clay and 1 foot of vegetative soil. The clay soil forms the moisture barrier layer that prevents moisture infiltration into the buried landfilled wastes.

The HWMF final cap is more unique, comprised of a composite soil and geomembrane structure. The vegetative soil layer is 18 inches thick which will permit incorporation of the dried biosolids in the final cap.

#### Potential Impacts To Be Avoided From Biosolids Handling Procedures

*Infiltration of moisture into cap* – The biosolids processing areas are on the sloping hillsides of the Class II landfill. The standard landfill final cap on these slopes is a 4-foot thickness of compacted soil. One foot of compacted soil overlies the 1-foot thick clay barrier layer. A 2-foot thick foundation soil layer underlies the clay layer. One of the prime purposes of the final cap is to minimize the infiltration of moisture into the cap.

Deep infiltration through the clay layer should not occur on the slope. The high moisture biosolids would wet the top few inches of the topmost soil layer as the liquid was wicked down from the biosolids materials into the soil. However, as the biosolids dried, the top of the soil layer will also dry.

Since, the repetitive spreading operation is planned to achieve substantial drying of the biosolids before the next application, it will be several ~~weeks~~days before the next application is made. This will allow the soil to partially dry.

Experience has been gained in evaluating the cap moisture control function. In 1999 test holes were made into the Class II Site final cap to determine moisture penetration from the normal rainfall. This was conducted as part of monitoring of the cap to obtain information in HWMF cap design evaluation.

In the October ~~1998-1999~~ tests, the in-situ dry vegetative soil was very firm and non-friable. Digging the holes required substantial effort to hand dig down through the 1-foot thickness. The maximum depth where the roots were noted was 9 inches in the 1996 final cap area.

The rooting depth range of the other test holes was 3 to 6 inches. The excavations were made in areas of the slope where the plants were growing as high as 5 or 6 feet. However, in digging the test holes, when these larger height plants were removed such as from the center of the hole, the primary roots generally did not extend below 2 or 3 inches. The vegetative soil was very dry, whereas the top of the clay barrier layer was moist. It was easy to stick a screwdriver several inches into the clay, as compared to it would not penetrate into the overlying vegetative soil. However, no roots were noted on top or in the top few inches of the clay soil layer even though soil moisture was present.

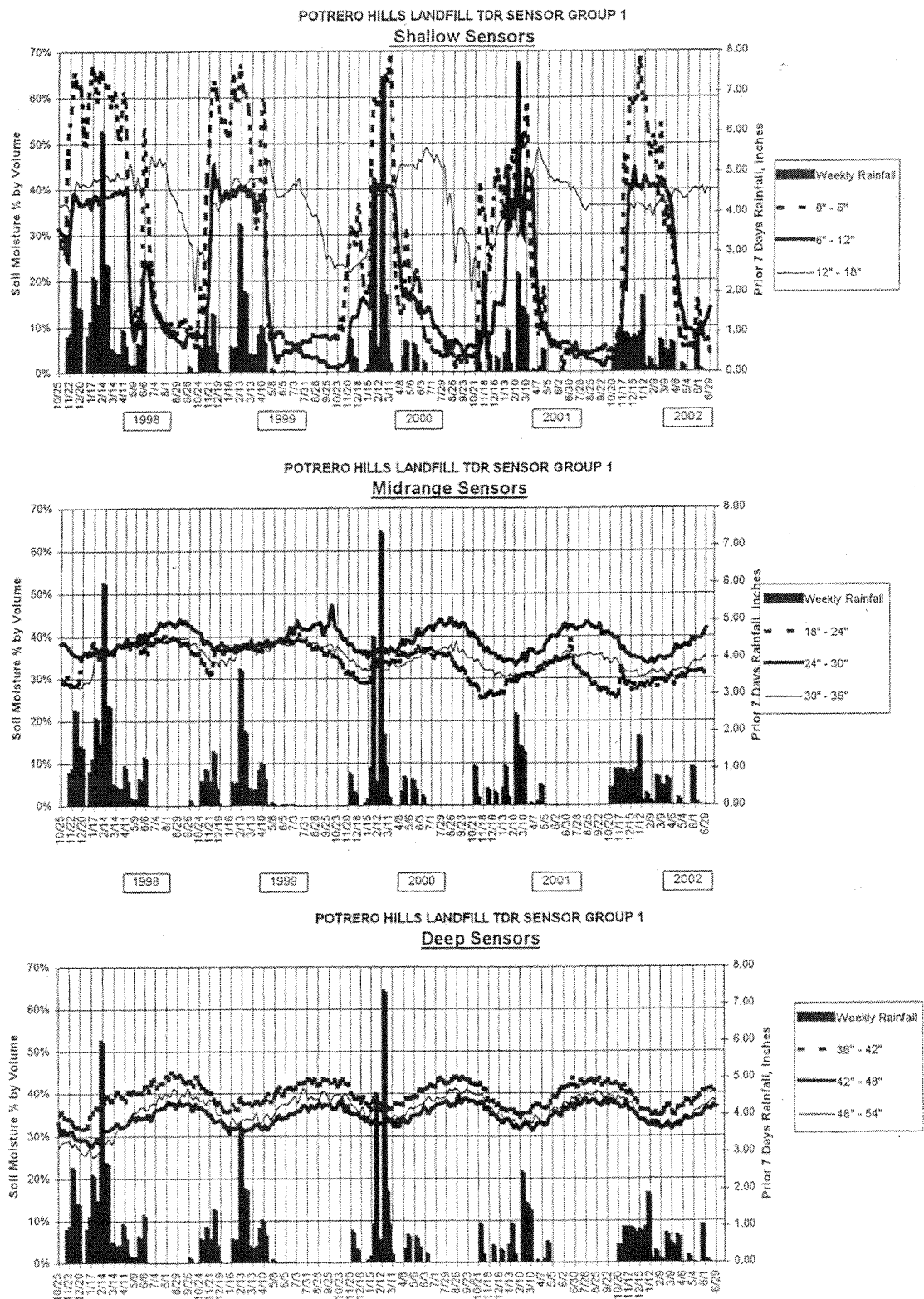
These results show the limited infiltration potential through the clay cap and the effects of the shallow-rooted grasses and weedy plants acting to remove the moisture.

Additional information is available from the ongoing Potrero Hills Landfill Engineered Alternative Final Cap investigation. At that landfill, a test area on the 3:1 final cap slope is instrumented with moisture sensors that track the moisture profile of a 60-inch thickness or depth of the soil cap. Figure 3H-2 portrays data from the Potrero Hills Landfill study and is included here for reference.

The graph shows at the beginning of the wet season that the moisture content of the surface soils immediately increases with the onset of rainfall. Several weeks after more rainfall, the 12" depth soil layer shows a moisture increase. However, even after 5 months of wet weather, the 18" depth soil layer shows no impact of rainfall infiltration. The data collection and observation shows that the deeper soils (18" to 60" depth) remain with relatively unchanged moisture levels after 5-6 years of annual rainfall.

At the WCL, even with continuous use of the eastern and southern slopes for biosolids processing, a similar wetting and drying cycle is expected, since the periods between biosolids applications will allow for loss of some of the extra moisture added by the biosolids during the dry weather period.

During the initial years of the biosolids applications at the WCL, soil moisture monitoring is planned to gain knowledge of the annual soil moisture pattern in the cap profile. The monitoring would be conducted on the materials applied during the first year of application. Prior to full-scale implementation further testing would be conducted to refine the rates and methods of application, under the review and oversight of the RWQCB as listed in EIR Mitigation Measure 6-4. Upon completion of the additional biosolids spreading trials WCL will prepare a Progress Report for RWQCB review and approval. The Progress Report would include, at a minimum, the following: (a) Purpose of Biosolids Spreading, (b) Approach and Methodology, (c) Results of the testing, (d) Environmental Controls, (e) Conclusions and Recommendations, and (f) other reporting components deemed necessary by the RWQCB. The Progress Report should demonstrate the maximum acceptable biosolids loading rate, given available site area and physical constraints, and the need to maximize drying and to control runoff. Revised permits would be obtained as necessary and the WCL would abide by the permit conditions.



**Figure 3H-2 Soil Moisture Trends 1997-2002**



*Removal of Final Cap Soil* – The periodic movement of tractors on the final cap could threaten the cap integrity if proper operation practices are not followed. Prior to use of the eastern and southern slope areas for repetitive placement and removal of the biosolids, additional soil would be placed on the slopes. This will provide a buffer on top of the existing final cap that now has been constructed.

Steps will be taken to include a marker layer similar to those used in the buffer layer underlying the resource recovery operations located on the landfill central plateau.

*Creation of nuisances* – Proper operational techniques will be developed and followed to avoid creation of nuisance odors and water quality impacts. These measures are described elsewhere in this Appendix in Section 7 (Runoff Control) and Section 10 (Other Environmental and Operational Factors).

### Monitoring and Maintenance

Periodically in May-June, moisture content sampling of biosolids layers and the final cap vegetative soil layer will be conducted by driving 1" or 2" diameter soil sampling tubes extending down to the top of the clay barrier layer. Periodically in May-June, moisture content sampling of biosolids layers and the final cap vegetative soil layer will be conducted by driving 1" or 2" diameter soil sampling tubes extending down to the

top of the clay barrier layer. The holes will be immediately backfilled with bentonite chips to reseal the hole. Seed mix will be planted at the top of hole if appropriate (if no new biosolids application is anticipated before next season). The moisture content of the soil samples will be determined using proper ASTM methods. The results will be recorded and reported.

Annually, the depth of the buffer layer in the biosolids processing areas will be determined to guard against removal of the cap soil as the biosolids are graded across the hillside or removed from the slope. This involves shallow test holes made to measure the soil thickness existing above the marker layer.

## **10. OTHER ENVIRONMENTAL AND OPERATIONAL FACTORS**

### Comparison With Existing Drying Lagoons

The biosolids that would be processed on the WCL slopes primarily would include those that are now lagoon-dried in the WCWD lagoons. A number of these ponds are adjacent to the Richmond Parkway. The existing Bay Trail bike path passes along the east side of these ponds (along the west

side of the Parkway). A new trail linking the Wildcat Creek and WCL public access trails may be created along the west side of the POTW~~WWTF~~, and hence adjacent to the existing western ponds.

The locations of the WCL biosolids spreading slopes are much more remote from public thoroughfares. An exception is the eastern slope area if the Waste Recycling Center is located in Area A. The access roadway to the WRC facility located there would pass along the base of the eastern slope area. Fencing would be in place to restrict public access to the biosolids processing area. WCL will probably not use the eastern slope for repetitive biosolids spreading if the Area A location is selected for the WRC facility. Biosolids may be applied to the final capped slopes as soil conditioner material.

### Public Health Aspects

The biosolids to be applied, composted or otherwise utilized at the WCL will be limited those that have been adequately processed through the normal POTW~~WWTF~~ biosolids digestion processes. These have reduced health impact significance as compared to raw biosolids sludge. However, the handling of these materials at the WCL must ~~do~~ be done with caution and effective notification of possibly affected parties.

Only employees who have been trained in the proper biosolids handling procedures, conditions and operations to be avoided, and good manner of health protection will be allowed to participate in the biosolids-handling program at the WCL. Proper protective equipment (clothing, masks, goggles, etc.) will be provided. Follow-up observation of working practices and re-training will be conducted quarterly to assure continuous respect for the public health aspects of this operation are being routinely followed. These training sessions will also allow feedback from all participants regarding improvements that can be made in the handling process or changes in the manner of monitoring and controlling the operation.

Compliance will be maintained with the Project EIR Mitigation Measure 11-7 such as proper inoculation of biosolids management employees, demonstration of the character of the lagooned biosolids, and demonstrations of the public health protection effectiveness of a combination of trail closure, rotational dried biosolids spreading, and fencing. Demonstrations will also be provided to the RWQCB and LEA to show compliance with the vector attraction reduction requirements of 40 CFR 503 regulations.

The biosolids will not be placed in any area where the public can have contact with the materials.

This includes the public access trail area of the western and northern landfill slopes. Biosolids placed in those areas will be done only when the areas are closed and fenced off to prevent public access, and when the materials will be disked into the shallow soil mantle of the landfill cover. At proper setback distances from the edges of the biosolids application area, fences will be erected and maintained and signs will be posted indicating the boundaries of the area and warning unauthorized persons to not enter the area. The materials will not be applied near the toe of the western and northern landfill slopes so that the lower shoreline trail can be maintained in use to the fullest extent .

The spraying of the biosolids has the potential to cause wind drift of the biosolids liquid in mist or fine droplets form to adjacent areas. The operators of the spray equipment will be thoroughly trained to watch and assure that the materials are applied to the intended surface. Through experience, limits will be established for various wind speeds that will involve establishing setback distances from adjacent areas or outright halting of spraying. The spraying pattern will be done to avoid the biosolids from being blown back onto the operator or the equipment. The intent is to spray in the downward wind direction.

The annual report will contain a summary of the public health aspects of the preceding year's operation including a review of the health protection procedures that were employed and corrective measures that were or need to be taken.

### Aesthetics

Persons traveling down the Richmond Parkway and the Bay Trail located along the Parkway can view the WCL.

More distant views occur from the hillside residential areas to the east and south. When the Public Access Trail is opened around the eastern and southern perimeters of the WCL property, that will create the nearest observation point to the biosolids processing area. The nearest distance ranges from 300 to 900 feet. Figure 3-6 in chapter 3 shows the trail locations envisioned on the landfill. When dried biosolids are placed on the western and northern final cap slopes, portions of the Trail will need to be taken out of service for the 4 or 6 week period while the temporary fencing is installed and when the materials are being spread on the hillside. The areas nearest the trail will be mulched with straw to return the area to the seasonal brown and tan color of the adjacent hillside vegetation.

The appearance from offsite areas and the Public Access Trail will entail observation of the equipment periodically operating on the slope to spread out the materials. Also, periodically the processed material removal activities will be seen. These areas are sufficiently distant from the trail such that the appearance should not be negative, other than the trail user may have wished to have a

recreational hiking or biking scene with no commercial enterprise visible. The noise should not be distinguishable over the ambient noise of the nearby refinery operations.

Use of the ~~eastern-southern~~ slope spreading area, adjacent to the ~~access road leading to the~~ Waste Recycling Center if it is located in Area A, should not be aesthetically displeasing. The operation would resemble constructions projects that have been common at the landfill.

### Litter Control Measures

The litter control requirements of LUP Section 24 and CUP Section 22 would apply to this operation. Due to the biosolids and soil materials being handled, little litter should be created. In addition to those methods described in the FDIP report, no specific litter control measures would be needed.

### Odors

The odor control requirements of LUP Section 23 and CUP Section 20 would apply to this operation. No nuisance odors are expected since the thickness of the biosolids layers will be maintained such that anaerobic conditions should not occur. The musty odor of the biosolids may be present at times similar to that which occurs when the existing drying lagoons are plowed. The biosolids being applied will be monitored for nuisance odors. Odorous materials will be rejected from being managed at the WCCSL.

The liquid biosolids spreading demonstration program work plan identified in EIR Mitigation Measure 10-7 would be prepared, under the review and oversight of the LEA and BAAQMD. The goal is to demonstrate whether residual odor would be consistent with the impact standards of the BAAQMD and the project EIR. The work plan would include the items listed in the EIR on types of biosolids, data to be collected and application methods. This demonstration project would be conducted under the review and oversight of the LEA and BAAQMD.

### Transportation

*Pipeline and Storage Tank* – The transport pipeline from the pumping station located at the POTWWTF will be placed underground passing through the POTWWTF, through the WCL front entrance area and through the WCL Area A.

Temporarily the pipeline will be placed on the ground surface where it runs up the grade to the edge of the central plateau. Later this pipeline will be placed underground after the initial major settlement of the landfill has occurred. A 20,000-gallon tank may be placed on the central plateau to serve as a filling station for the tank truck spraying operation.

*Inbound Trucks* – The number of trucks depends upon the amount of POTW/WWTF solar drying lagoons continued in service by the WCWD. If the biosolids are pumped to the WCL drying area, or to the storage tank then few numbers of trucks would be used annually. As now occurs, the dried biosolids materials contained in the remaining lagoons in August and September will be hauled out over a several week period and placed on the final capped slopes, or possibly composted. Currently about 800 truckloads are involved annually over about a one month duration.

*Outbound Trucks* – Periodically trucks will be used to transport the finished dried biosolids or soil/biosolids mix to the point of use off-site.

### Water Supply

Water is not required for the biosolids processing operation, except for the haul roads. Dust control in the nearby area and on access roads will be accomplished by spraying water with the site water trucks per existing permit requirements. Drinking water for operations personnel is supplied via bottled water.

### Pooling of Biosolids Liquids

Periodic smooth grading of the slopes should prevent pooling of biosolids liquids on the slopes. This would be done by a dozer back-blading the slope area.

### Energy Consumption

*Comparison with Filter Press and Centrifuge Alternatives* – The solar and air drying of the biosolids on the slope is much less energy consumptive compared to the use of a filter press or centrifuge which require significant amount of electricity to operate. Some electrical power would be consumed in pumping the biosolids up to the WCL spreading areas, but it is expected to be only a small percentage of the mechanical dewatering energy needs.

*Trucking to WCL areas* – If a portion of the existing WCWD biosolids drying lagoons remained in operation, energy would be expended by the tractor plowing and tracking through the lagoons to dry the material, and the loadout and truck transport of the biosolids to the WCL. This removal effort would be less than for hauling the biosolids cake from the Filter Press or Centrifuge.

The lower moisture content lagoon dried materials would constitute less volume to be hauled, thus requiring fewer truck trips.

*Handling of biosolids materials on slopes* – The current limited information indicates that the amount of energy consumed in placing the materials on the final capped slopes as soil amendment would be approximately equal to the existing WCWD lagoon drying program. Handling the mechanical dewatered biosolids on the slopes to further dry them and combine with soil for recovery might be more energy intensive due to the need to spread them on the slopes with a tractor. However, the liquid biosolids spread at the top of the slopes may require multiple regrading of the layers on the slope to even the thickness of the biosolids. Spraying of the liquid biosolids from a tank truck may require the periodic tracking of the slope vegetation by a bulldozer to create a more uniform biosolids application. Mowing of the green slope vegetation may be necessary.

### Fire Control

Due to the thin layer depth and low fire potential of the biosolids, no special measures are anticipated to occur. Compliance will be maintained with the FDIP fire control requirements (e.g. control of wildfires). If lush vegetation growth occurs due to the increased moisture and nutrient availability, at the end of the application season when the foliage dries and browns off, a bulldozer or mower may need to reduce the depth of the vegetation as a fire prevention measure.

### Equipment Servicing Area

The equipment would be serviced as part of the BMPC equipment-servicing program. The WCCSL equipment maintenance personnel will accomplish the routine maintenance.

### Dust Control

A water truck would be used to periodically spray the site access roads for dust control per existing permits.

### Site Security

The primary security is the WCCSL exterior fence and gate located at the end of Parr Blvd. Persons traveling on the access road must pass the WCCSL scale house. The general public using the WCCSL would be excluded from the biosolids processing operation. Fencing would be installed

around the spreading areas used annually on the western and northern slopes containing the Public Access Trail. The postclosure plan will include a fence monitoring and maintenance activity. The biosolids storage tank and the tank truck filling area would be fenced and access would be limited to authorized WCL personnel.

#### Residuals Management (LUP Section 11.4 and CUP Section 9.3)

Certain excess vegetation material may be created seasonally, such as clearing plant growth materials from the slope prior to beginning the spreading operation. These materials can be disked into the slope, left in a crushed condition on the slope, or collected and delivered to the composting facility.

#### Contingencies

WCCSL, Inc. has established response programs for the cases of accidents, fires, and equipment malfunction. The site personnel are equipped with radios to maintain contact with the WCCSL office. A list of emergency contact numbers is maintained and the site has a Fire Control Plan and a Hazardous Materials Management Plan. No materials are anticipated to be used in the biosolids processing that would require identification in the WCCSL MSDS log and the Hazardous Materials Management Plan. One contingency plan is to provide pooling areas along the ditches on the south slope roads for the event where the biosolids are channeled down the slope and enter the ditch. Daily observation would be made of each channel. A monitoring log will be maintained to certify that the observations are being accomplished. The plan will anticipate that a tractor may be required on short notice to build a temporary berm to isolate such runoff (such as building up the bottom edge berm). Training of operators will be conducted annually to alert them of this possible scenario and to practice the control measures. Observations will be made of specific locations on the slopes where runoff periodically occurs, and either the biosolids applications will be reduced, or grading will be performed to achieve better areal coverage of the slope.

## **11. MONITORING & REPORTING**

The following is a listing of the content of the monitoring and reporting program envisioned for the biosolids management program. The information will be tabulated monthly and provided to the agencies quarterly or upon request.

Quantities Handled – As applicable, specify the tons or gallons by percent moisture that are applied to the slopes. The composting program will identify the amount of biosolids that are composted.

Location of Processing Area – Indicate the area used per month (location and area size) coupled with the amount of material applied per area.

Schedule of Processing Per Area – Provide a summary of the processing time for the various application areas.

Quantities Removed – Indicate the amount of material removed from the various processing areas.

Runoff Monitoring -- monitor the amount and character of the stormwater runoff from the various processing areas

Soil Moisture Monitoring – Monitor the dept of moisture penetration due to biosolids spreading.

Public Comments – Provide a summary of comments received from the public

Reporting of Critical Events – The following will be reported:

- Odor nuisance complaints
- Lack of containment of biosolids
- Grading corrections

Biosolids Buildup In Vegetative Layer Of Cap – monitor the thickness of biosolids stored on the various processing areas

Thickness of Cap Remaining Underlying Processing Areas - monitor the thickness of the vegetative soil layer above the clay barrier layer.

Monitoring of the Security Fences at Boundaries of the Biosolids Application Areas - monitor to assure the fencing and signing remain in good serviceable condition.

A report will be prepared and submitted to the appropriate agencies on the schedule that is established in the WCL permitting process. The report will contain descriptions of the above items for the monitoring period. Tables and maps will be included as applicable.



## **12. FACILITY CLEANUP AND CLOSURE ACTIVITIES**

### Schedule

There is no current estimate of when the biosolids spreading and application management method would be closed out if this biosolids management technique at the WCL is successful. The ~~POTW~~WWTF will remain at its present location for the foreseeable future. Biosolids generation will continue at the ~~POTW~~WWTF requiring disposal or recovery. This Section is contained in the Appendix to meet information needs and to interface with the WCL Class II Site Postclosure Plan.

### Site Cleanup

For site cleanup, that thickness of the final biosolids layer that is not desirable to leave on the slope as soil amendment, will be removed. Also, any pipes that are not needed for other purposes will be removed. The remaining biosolids will be mixed into the underlying materials and the plant seeding will occur in October.

### Postclosure Site Monitoring and Maintenance

For the period specified, the normal WCL Postclosure Plan monitoring and maintenance activities will be conducted similar to actions taken for the other final slope areas.

--- *West Contra Costa Sanitary Landfill, Inc.* ---  
**MEMORANDUM**

3260 Blume Drive, Suite 200 Richmond, CA 94806

Phone (510) 262-1660

Fax Phone (510) 262-1656

February 19, 2004

To: Paul Scheidegger

From: Michael Boyle

**Subject: WCWD AND COR SLUDGE LAGOON ANALYSIS FOR DRAFT  
EIR APPENDIX 3H**

- 
- Transmitted with this memo is the most recent analysis of the sludge from the combined West County Water District and City of Richmond Sludge lagoon. This information should be attached to the end of Appendix 3H.
- 

If you have questions concerning the above information please contact me at (510) 262-1667 or Larry Burch at 262-1662.

---000---

w eir info 2-19-04b



Sequoia  
Analytical

819 Striker Avenue, Suite 8  
Sacramento, CA 95834  
(916) 921-9600  
FAX (916) 921-0100  
www.sequoialabs.com

West County Wastewater District  
2377 Garden Tract Rd.  
Richmond CA, 94801

Project: Annual Dry Sludge - Lot C  
Project Number: N/A  
Project Manager: Paul Stovall

S310434  
Reported:  
11/10/03 15:28

ANALYTICAL REPORT FOR SAMPLES

| Sample ID        | Laboratory ID | Matrix | Date Sampled   | Date Received  |
|------------------|---------------|--------|----------------|----------------|
| LOT C Lagoon #12 | S310434-01    | Soil   | 10/17/03 00:00 | 10/17/03 12:10 |

Combined sludge WCWD + COR

TS = 73%



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Analytical**

819 Striker Avenue, Suite 8  
Sacramento, CA 95834  
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FAX (916) 921-0100  
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Project: Annual Dry Sludge - Lot C  
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S310434  
Reported:  
11/10/03 15:28

**Organophosphorus Pesticides by EPA Method 8141A**  
**Sequoia Analytical - Morgan Hill**

| Analyte                                                                             | Result | Reporting<br>Limit | Units | Dilution | Batch   | Prepared | Analyzed | Method    | Notes      |
|-------------------------------------------------------------------------------------|--------|--------------------|-------|----------|---------|----------|----------|-----------|------------|
| LOT C Lagoon #12 (S310434-01) Soil Sampled: 10/17/03 00:00 Received: 10/17/03 12:10 |        |                    |       |          |         |          |          |           | C-06, R-05 |
| Azinphos methyl                                                                     | ND     | 400                | ug/kg | 10       | 3121011 | 10/21/03 | 10/29/03 | EPA 8141A |            |
| Bolstar                                                                             | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Chlorpyrifos                                                                        | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Coumaphos                                                                           | ND     | 400                | "     | "        | "       | "        | "        | "         |            |
| Demeton                                                                             | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Diazinon                                                                            | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Dichlorvos                                                                          | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Dimethoate                                                                          | ND     | 400                | "     | "        | "       | "        | "        | "         |            |
| Disulfoton                                                                          | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Ethion                                                                              | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Ethoprop                                                                            | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| EPN                                                                                 | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Fensulfothion                                                                       | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Fenthion                                                                            | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Phion                                                                               | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Merphos                                                                             | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Mevinphos                                                                           | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Monocrotophos                                                                       | ND     | 1000               | "     | "        | "       | "        | "        | "         |            |
| Naled                                                                               | ND     | 400                | "     | "        | "       | "        | "        | "         |            |
| Parathion-ethyl                                                                     | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Parathion-methyl                                                                    | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Phorate                                                                             | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Ronnel                                                                              | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Stirophos                                                                           | ND     | 400                | "     | "        | "       | "        | "        | "         |            |
| Sulfotep                                                                            | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Thionazin                                                                           | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Tokuthion (Prothiofos)                                                              | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Trichloronate                                                                       | ND     | 200                | "     | "        | "       | "        | "        | "         |            |
| Surrogate: Triphenyl phosphate                                                      |        | 770 %              |       | 20-165   | "       | "        | "        | "         | S-01       |



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Analytical**

819 Striker Avenue, Suite 8  
Sacramento, CA 95834  
(916) 921-9600  
FAX (916) 921-0100  
www.sequialabs.com

West County Wastewater District  
2377 Garden Tract Rd.  
Richmond CA, 94801

Project: Annual Dry Sludge - Lot C  
Project Number: N/A  
Project Manager: Paul Stovall

S310434  
Reported:  
11/10/03 15:28

**Total Metals by EPA 6000/7000 Series Methods  
Sequoia Analytical - Sacramento**

| Analyte                                                                             | Result | Reporting<br>Limit | Units | Dilution | Batch   | Prepared | Analyzed | Method    | Notes |
|-------------------------------------------------------------------------------------|--------|--------------------|-------|----------|---------|----------|----------|-----------|-------|
| LOT C Lagoon #12 (S310434-01) Soil Sampled: 10/17/03 00:00 Received: 10/17/03 12:10 |        |                    |       |          |         |          |          |           |       |
| Mercury                                                                             | 4.0    | 0.20               | mg/kg | 10       | 3100424 | 10/30/03 | 10/30/03 | EPA 7471A |       |
| Antimony                                                                            | ND     | 10                 | "     | 4        | 3100380 | 10/28/03 | 11/05/03 | EPA 6010A |       |
| Arsenic                                                                             | 18     | 10                 | "     | "        | "       | "        | "        | "         |       |
| Barium                                                                              | 300    | 10                 | "     | "        | "       | "        | "        | "         |       |
| Beryllium                                                                           | ND     | 1.0                | "     | "        | "       | "        | "        | "         |       |
| Cadmium                                                                             | 2.4    | 1.0                | "     | "        | "       | "        | "        | "         |       |
| Chromium                                                                            | 44     | 1.0                | "     | "        | "       | "        | "        | "         |       |
| Cobalt                                                                              | 6.2    | 4.0                | "     | "        | "       | "        | "        | "         |       |
| Copper                                                                              | 260    | 1.0                | "     | "        | "       | "        | "        | "         |       |
| Lead                                                                                | 82     | 10                 | "     | "        | "       | "        | "        | "         |       |
| Molybdenum                                                                          | 5.1    | 4.0                | "     | "        | "       | "        | "        | "         |       |
| Nickel                                                                              | 49     | 4.0                | "     | "        | "       | "        | "        | "         |       |
| Selenium                                                                            | ND     | 10                 | "     | "        | "       | "        | "        | "         |       |
| Silver                                                                              | 13     | 1.0                | "     | "        | "       | "        | "        | "         |       |
| Thallium                                                                            | 22     | 20                 | "     | "        | "       | "        | "        | "         |       |
| Vanadium                                                                            | 21     | 4.0                | "     | "        | "       | "        | "        | "         |       |
| Zinc                                                                                | 480    | 1.0                | "     | "        | "       | "        | "        | "         |       |



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Richmond CA, 94801

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Project Number: N/A  
Project Manager: Paul Stovall

S310434  
Reported:  
11/10/03 15:28

**Volatile Organic Compounds by EPA Method 8260B  
Sequoia Analytical - Sacramento**

| Analyte                                                                             | Result | Reporting Limit | Units | Dilution | Batch   | Prepared | Analyzed | Method    | Notes |
|-------------------------------------------------------------------------------------|--------|-----------------|-------|----------|---------|----------|----------|-----------|-------|
| LOT C Lagoon #12 (S310434-01) Soil Sampled: 10/17/03 00:00 Received: 10/17/03 12:10 |        |                 |       |          |         |          |          |           | R-01  |
| Benzene                                                                             | ND     | 0.025           | mg/kg | 5        | 3100390 | 10/28/03 | 10/28/03 | EPA 8260B |       |
| Bromobenzene                                                                        | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Bromochloromethane                                                                  | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Bromodichloromethane                                                                | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Bromoform                                                                           | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Bromomethane                                                                        | ND     | 0.12            | "     | "        | "       | "        | "        | "         |       |
| n-Butylbenzene                                                                      | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| sec-Butylbenzene                                                                    | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| tert-Butylbenzene                                                                   | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Carbon tetrachloride                                                                | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Chlorobenzene                                                                       | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Chloroethane                                                                        | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Chloroform                                                                          | ND     | 0.12            | "     | "        | "       | "        | "        | "         |       |
| Chloromethane                                                                       | ND     | 0.12            | "     | "        | "       | "        | "        | "         |       |
| o-chlorotoluene                                                                     | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| p-chlorotoluene                                                                     | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Dibromochloromethane                                                                | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 1,2-Dibromoethane (EDB)                                                             | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Dibromomethane                                                                      | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 1,2-Dibromo-3-chloropropane                                                         | ND     | 0.12            | "     | "        | "       | "        | "        | "         |       |
| 1,2-Dichlorobenzene                                                                 | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 1,3-Dichlorobenzene                                                                 | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 1,4-Dichlorobenzene                                                                 | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Dichlorodifluoromethane                                                             | ND     | 0.12            | "     | "        | "       | "        | "        | "         |       |
| 1,1-Dichloroethane                                                                  | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 1,2-Dichloroethane                                                                  | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 1,1-Dichloroethene                                                                  | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| cis-1,2-Dichloroethene                                                              | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| trans-1,2-Dichloroethene                                                            | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 1,2-Dichloropropane                                                                 | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 1,3-Dichloropropane                                                                 | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 2,2-Dichloropropane                                                                 | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| 1,1-Dichloropropene                                                                 | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Ethylbenzene                                                                        | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Hexachlorobutadiene                                                                 | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Isopropylbenzene                                                                    | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| p-Isopropyltoluene                                                                  | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Methylene chloride                                                                  | ND     | 0.12            | "     | "        | "       | "        | "        | "         |       |
| Methyl tert-butyl ether                                                             | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |
| Naphthalene                                                                         | ND     | 0.025           | "     | "        | "       | "        | "        | "         |       |

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Analytical**

819 Striker Avenue, Suite 8  
Sacramento, CA 95834  
(916) 921-9600  
FAX (916) 921-0100  
www.sequiolabs.com

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Project: Annual Dry Sludge - Lot C  
Project Number: N/A  
Project Manager: Paul Stovall

S310434  
Reported:  
11/10/03 15:28

**Volatile Organic Compounds by EPA Method 8260B  
Sequoia Analytical - Sacramento**

| Analyte                                                                             | Result | Reporting<br>Limit | Units  | Dilution | Batch   | Prepared | Analyzed | Method    | Notes |
|-------------------------------------------------------------------------------------|--------|--------------------|--------|----------|---------|----------|----------|-----------|-------|
| LOT C Lagoon #12 (S310434-01) Soil Sampled: 10/17/03 00:00 Received: 10/17/03 12:10 |        |                    |        |          |         |          |          |           | R-01  |
| n-Propylbenzene                                                                     | ND     | 0.025              | mg/kg  | 5        | 3100390 | 10/28/03 | 10/28/03 | EPA 8260B |       |
| Styrene                                                                             | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| 1,1,1,2-Tetrachloroethane                                                           | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| 1,1,2,2-Tetrachloroethane                                                           | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| Tetrachloroethene                                                                   | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| Toluene                                                                             | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| 1,2,3-Trichlorobenzene                                                              | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| 1,2,4-Trichlorobenzene                                                              | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| 1,1,1-Trichloroethane                                                               | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| 1,1,2-Trichloroethane                                                               | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| Trichloroethene                                                                     | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| Trichlorofluoromethane                                                              | ND     | 0.12               | "      | "        | "       | "        | "        | "         |       |
| 1,2,3-Trichloropropane                                                              | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| 1,2,4-Trimethylbenzene                                                              | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| -Trimethylbenzene                                                                   | ND     | 0.025              | "      | "        | "       | "        | "        | "         |       |
| Vinyl chloride                                                                      | ND     | 0.12               | "      | "        | "       | "        | "        | "         |       |
| Xylenes (total)                                                                     | ND     | 0.050              | "      | "        | "       | "        | "        | "         |       |
| Surrogate: Dibromofluoromethane                                                     |        | 96 %               | 60-140 | "        | "       | "        | "        | "         |       |
| Surrogate: 1,2-DCA-d4                                                               |        | 97 %               | 60-140 | "        | "       | "        | "        | "         |       |
| Surrogate: Toluene-d8                                                               |        | 125 %              | 60-140 | "        | "       | "        | "        | "         |       |
| Surrogate: 4-BFB                                                                    |        | 114 %              | 60-140 | "        | "       | "        | "        | "         |       |

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Project Manager: Paul Stovall

S310434  
Reported:  
11/10/03 15:28

**Semivolatile Organic Compounds by EPA Method 8270C  
Sequoia Analytical - Sacramento**

| Analyte                                                                             | Result | Reporting<br>Limit | Units | Dilution | Batch   | Prepared | Analyzed | Method    | Notes |
|-------------------------------------------------------------------------------------|--------|--------------------|-------|----------|---------|----------|----------|-----------|-------|
| LOT C Lagoon #12 (S310434-01) Soil Sampled: 10/17/03 00:00 Received: 10/17/03 12:10 |        |                    |       |          |         |          |          |           | R-06  |
| N-Nitrosodimethylamine                                                              | ND     | 2000               | ug/kg | 1        | 3100409 | 10/29/03 | 11/06/03 | EPA 8270C |       |
| Phenol                                                                              | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Aniline                                                                             | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Bis(2-chloroethyl)ether                                                             | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2-Chlorophenol                                                                      | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 1,3-Dichlorobenzene                                                                 | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 1,4-Dichlorobenzene                                                                 | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Benzyl alcohol                                                                      | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 1,2-Dichlorobenzene                                                                 | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2-Methylphenol                                                                      | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Bis(2-chloroisopropyl)ether                                                         | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 4-Methylphenol                                                                      | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| N-Nitrosodi-n-propylamine                                                           | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Hexachloroethane                                                                    | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| benzene                                                                             | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Isophorone                                                                          | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2-Nitrophenol                                                                       | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2,4-Dimethylphenol                                                                  | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Bis(2-chloroethoxy)methane                                                          | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Benzoic acid                                                                        | ND     | 5000               | "     | "        | "       | "        | "        | "         |       |
| 2,4-Dichlorophenol                                                                  | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 1,2,4-Trichlorobenzene                                                              | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Naphthalene                                                                         | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 4-Chloroaniline                                                                     | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Hexachlorobutadiene                                                                 | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 4-Chloro-3-methylphenol                                                             | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2-Methylnaphthylene                                                                 | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Hexachlorocyclopentadiene                                                           | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2,4,6-Trichlorophenol                                                               | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2,4,5-Trichlorophenol                                                               | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2-Chloronaphthalene                                                                 | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2-Nitroaniline                                                                      | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Dimethyl phthalate                                                                  | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Acenaphthylene                                                                      | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2,6-Dinitrotoluene                                                                  | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 3-Nitroaniline                                                                      | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Acenaphthene                                                                        | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| 2,4-Dinitrophenol                                                                   | ND     | 5000               | "     | "        | "       | "        | "        | "         |       |
| 4-Nitrophenol                                                                       | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |
| Dibenzofuran                                                                        | ND     | 2000               | "     | "        | "       | "        | "        | "         |       |

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Project Number: N/A  
Project Manager: Paul Stovall

S310434  
Reported:  
11/10/03 15:28

**Semivolatile Organic Compounds by EPA Method 8270C**  
**Sequoia Analytical - Sacramento**

| Analyte                                                                               | Result | Reporting Limit | Units    | Dilution | Batch   | Prepared | Analyzed | Method    | Notes |
|---------------------------------------------------------------------------------------|--------|-----------------|----------|----------|---------|----------|----------|-----------|-------|
| LOT C Lagoon #12 (S310434-01) Soil - Sampled: 10/17/03 00:00 Received: 10/17/03 12:10 |        |                 |          |          |         |          |          |           | R-06  |
| 2,4-Dinitrotoluene                                                                    | ND     | 2000            | ug/kg    | 1        | 3100409 | 10/29/03 | 11/06/03 | EPA 8270C |       |
| Diethyl phthalate                                                                     | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| 4-Chlorophenyl phenyl ether                                                           | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Fluorene                                                                              | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| 4,6-Dinitro-2-methylphenol                                                            | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| N-Nitrosodiphenylamine                                                                | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Azobenzene                                                                            | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| 4-Nitroaniline                                                                        | ND     | 5000            | "        | "        | "       | "        | "        | "         |       |
| 4-Bromophenyl phenyl ether                                                            | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Hexachlorobenzene                                                                     | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Pentachlorophenol                                                                     | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Phenanthrene                                                                          | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Anthracene                                                                            | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Carbazole                                                                             | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| n-butyl phthalate                                                                     | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Fluoranthene                                                                          | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Pyrene                                                                                | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Benzyl butyl phthalate                                                                | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| 3,3'-Dichlorobenzidine                                                                | ND     | 5000            | "        | "        | "       | "        | "        | "         |       |
| Bis(2-ethylhexyl)phthalate                                                            | 13100  | 5000            | "        | "        | "       | "        | "        | "         |       |
| Benzo (a) anthracene                                                                  | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Chrysene                                                                              | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Di-n-octyl phthalate                                                                  | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Benzo (b & k) fluoranthene (total)                                                    | ND     | 4000            | "        | "        | "       | "        | "        | "         |       |
| Benzo (a) pyrene                                                                      | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Indeno (1,2,3-cd) pyrene                                                              | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Dibenz (a,h) anthracene                                                               | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Benzo (ghi) perylene                                                                  | ND     | 2000            | "        | "        | "       | "        | "        | "         |       |
| Surrogate: 2-Fluorophenol                                                             |        | 46 %            | 39.2-113 |          | "       | "        | "        | "         |       |
| Surrogate: Phenol-d6                                                                  |        | 56 %            | 42.3-111 |          | "       | "        | "        | "         |       |
| Surrogate: Nitrobenzene-d5                                                            |        | 61 %            | 43.5-113 |          | "       | "        | "        | "         |       |
| Surrogate: 2-Fluorobiphenyl                                                           |        | 70 %            | 44.6-118 |          | "       | "        | "        | "         |       |
| Surrogate: 2,4,6-Tribromophenol                                                       |        | 50 %            | 26.1-147 |          | "       | "        | "        | "         |       |
| Surrogate: Terphenyl-d14                                                              |        | 124 %           | 36-144   |          | "       | "        | "        | "         |       |

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2377 Garden Tract Rd.  
Richmond CA, 94801

Project: Annual Dry Sludge - Lot C

S310434

Project Number: N/A

Reported:

Project Manager: Paul Stovall

11/10/03 15:28

## Conventional Chemistry Parameters by APHA/EPA Methods Sequoia Analytical - Sacramento

| Analyte                                                                             | Result | Reporting<br>Limit | Units     | Dilution | Batch   | Prepared | Analyzed | Method    | Notes |
|-------------------------------------------------------------------------------------|--------|--------------------|-----------|----------|---------|----------|----------|-----------|-------|
| LOT C Lagoon #12 (S310434-01) Soil Sampled: 10/17/03 00:00 Received: 10/17/03 12:10 |        |                    |           |          |         |          |          |           |       |
| Total Solids                                                                        | 73     | 0.10%              | by Weight | 1        | 3100397 | 10/28/03 | 10/29/03 | EPA 160.3 | HT-04 |

**North Coast Laboratories, Ltd.**

Date: 29-Oct-03

CLIENT: Sequoia Analytical

Project: S310434

Lab Order: 0310549

**CASE NARRATIVE**

EPA 632:

Some reporting limits were raised due to matrix interference.

The laboratory control sample/laboratory control sample duplicate (LCS/LCSD) recoveries were above the upper acceptance limit for carbaryl. These recoveries indicate that the sample results may be erroneously high. There were no detectable levels of the analyte in the sample; therefore, the data were accepted.

Date: 29-Oct-03

## ANALYTICAL REPORT

WorkOrder: 0310549

Client Sample ID: S310434-01

Received: 10/22/03

Collected: 10/17/03 0:00

Lab ID: 0310549-01A

Test Name: Carbamate and Urea Pesticides

Reference: EPA 632 Modified

| <u>Parameter</u>     | <u>Result</u> | <u>Limit</u> | <u>Units</u> | <u>DF</u> | <u>Extracted</u> | <u>Analyzed</u> |
|----------------------|---------------|--------------|--------------|-----------|------------------|-----------------|
| Oxamyl               | ND            | 0.50         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Methomyl             | ND            | 0.50         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Fenuron              | ND            | 0.20         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Monuron              | ND            | 0.20         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Propoxur             | ND            | 0.50         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Carbofuran           | ND            | 0.50         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Carbaryl             | ND            | 0.50         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Fluometuron          | ND            | 0.20         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Diuron               | ND            | 0.20         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Propham              | ND            | 2.5          | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Siduron              | ND            | 0.50         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Methlocarb           | ND            | 1.0          | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Linuron              | ND            | 0.20         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Swep                 | ND            | 0.20         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Chlorpropham         | ND            | 1.0          | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Barbane              | ND            | 5.0          | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Neburon              | ND            | 0.20         | µg/g         | 1.0       | 10/23/03         | 10/28/03        |
| Surrogate: Simeazine | 76.5          | 52.3-119     | % Rec        | 1.0       | 10/23/03         | 10/28/03        |